

Flood Risk Sequential and Exception Test

Land at Rectory Farm (North), Yatton, North Somerset

On Behalf of Persimmon Homes Severn Valley

March 2023

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'Outline planning application for the development of up to 190 homes (including 50% affordable homes), 0.13ha of land reserved for Class E uses, allotments, car parking, earthworks to facilitate sustainable drainage systems, open space and all other ancillary infrastructure and enabling works with means of access from Shiners Elms for consideration. All other matters (means of access from Chescombe Road, internal access, scale, layout, appearance and landscaping) reserved for subsequent approval.'

Prepared on behalf of Persimmon Homes Severn Valley

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CONTENTS

	Page
1.0 Introduction	1
2.0 Background Context and Site Overview	2
3.0 Planning Policy Considerations	7
4.0 Methodology	19
5.0 The Sequential Test	23
6.0 The Exception Test	55
7.0 Conclusions.....	65

APPENDICES

Appendix 1 – Site Location Plan

Appendix 2 – Flood Defences in North Somerset

Appendix 3 – Schedule of sites discounted through the FRST first stage

Appendix 4 – Detailed Site Analysis

Appendix 5 – Persimmon Homes Winterstoke Village Phasing Plan

1.0 INTRODUCTION

1.1 This Flood Risk Sequential Test and Exception Test has been prepared by Barton Willmore, now Stantec on behalf of Persimmon Homes Severn Valley (the 'Applicant') in support of an outline planning application for the proposed development of Land at Rectory Farm (North), Chescombe Road, Yatton (the 'Site') for the following description of development:

'Outline planning application for the development of up to 190 homes (including 50% affordable homes), 0.13ha of land reserved for Class E uses, allotments, car parking, earthworks to facilitate sustainable drainage systems, open space and all other ancillary infrastructure and enabling works with means of access from Shiners Elms for consideration. All other matters (means of access from Chescombe Road, internal access, scale, layout, appearance and landscaping) reserved for subsequent approval.'

- 1.2 The Site Location plan for the outline planning application can be found at **Appendix 1**.
- 1.3 This Sequential Test has been prepared in line with national and local policy and guidance, and the methodology is detailed in **Section 4** of this report. The purpose of this report is to address policy requirements in respect of the suitability of the Site for the proposed residential development in terms of flood risk, having due regard to reasonably alternative sites within North Somerset.
- 1.4 The Report should be read in conjunction with the submitted Flood Risk Assessment & Hydraulic Modelling Report, Drainage Strategy and Planning Statement.
- 1.5 The Report demonstrates the Site is one of the most sequentially preferable sites for residential development and that it is the most sequentially preferable site for the proposal of 190 homes with 50% affordable housing, land for Use Class E and other benefits including extensive public open space, allotments and biodiversity benefits in North Somerset, at the time intended for development. The proposal also complies with both limbs of the Exception Test.
- 1.6 Therefore, the development is entirely consistent with local and national planning policy and guidance concerning flood risk. As such, flood risk does not present a barrier to the sustainable development of the Site with the mitigation measures proposed in the Flood Risk Assessment & Hydraulic Modelling Report.

2.0 BACKGROUND CONTEXT AND SITE OVERVIEW

The Site

- 2.1 The Site is located on the western edge of Yatton and is comprised of grazing land and agricultural fields, measuring approximately 13.79 hectares. It is formed of multiple fields divided by drainage water rhynes (ditches), with hedgerows and trees located within the Site and around its perimeter.
- 2.2 The Site is irregular in shape, with hedgerows and trees located internally and along the majority of the Site's boundaries. A series of drainage water ditches are located within the Site which border the various individual fields.
- 2.3 It is confirmed by the Environment's Agency online mapping system that the entirety of the Site is located within Flood Zone 3 (land having 1 in 100 or greater annual probability of river flooding, or land having a 1 in 200 or greater annual probability of sea flooding). With a network of drainage water ditches running through various parts of the Site, risk from surface water flooding is at low and medium probabilities.

Planning History

- 2.4 A review of the North Somerset Council online planning search has been undertaken and no planning application history relevant to the current proposals was found. The only previous planning application carried out on-site included the coppicing of hedgerows to access heavily silted drainage ditches. The following applications relate to the wider area.

Land at Rectory Farm, Chescombe Road, Yatton – 21/P/0236/OUT

- 2.5 An outline planning application (21/P/0236/OUT) was submitted at 'Land at Rectory Farm' (to the south of the application site) in 2021 for the following description of development: 'Outline planning application for a residential development of up to 100no. dwellings and associated infrastructure following demolition of existing buildings on site, with access for approval and all other matters for subsequent approval'.
- 2.6 The application was refused under delegated powers for the following reasons:
1. The proposed development of up to 100 dwellings would deliver a scale of development that is in conflict with the spatial strategy for the development plan, which permits sites of up to around 25 dwellings adjoining the settlements edges of service villages.

The proposed development is therefore contrary to policies CS14 and CS32 of the Core Strategy and the made Yatton Neighbourhood Plan.

2. The proposed development, due to its location in close proximity to the North Somerset and Mendip Bats SAC, would have significant effect on this habitat site. The site is located in Bat Consultation Zone B as designated in the North Somerset and Mendip Bats SAC SPD and the survey evidence and consultation with Natural England suggests that SAC bats would be adversely affected by the development. The proposed mitigation measures do not prioritise onsite mitigation, and the proposed offsite mitigation is unsuitable.

Additionally, the development, due to its location in close proximity to the Biddle Street SSSI, is likely to result in operational impacts and increase recreational pressure on this nationally designated site. The submitted Ecological Impact Assessment has not adequately identified and considered the scope of these impacts, nor identified how mitigation could be achieved.

The proposal also fails to adequately demonstrate how a Biodiversity Net Gain can be achieved on site, as the calculation of Biodiversity Net Gain includes habitat utilised for mitigation purposes. The proposed development is therefore contrary to Policy CS4 of the Core Strategy, Policy DM8 of the Sites and Policies Plan Part 1: Development Management Policies, the North Somerset and Mendip Bats SAC SPD and paragraphs 175 and 177 of the NPPF.

3. The proposed development, by reason of its protrusion in an area of high landscape sensitivity in close proximity to the Strawberry Line, does not accord with the linear form of the village and would appear an incongruous projection into open countryside. The proposal would cause unacceptable harm to the amenity value of the Strawberry Line being a popular recreational route forming part of the strategic cycle network. The proposed development is therefore contrary to Policies CS5 and CS9 of the Core Strategy, Policy DM10 of the Sites and Policies Plan Part 1 – Development Management Policies, the North Somerset Landscape Character Assessment SPD, and paragraphs 98 and 170 of the National Planning Policy Framework.
4. The proposed development, due to the substandard width of Chescombe Road, the inadequate visibility splays at the adjacent junction between Chescombe Road and Mendip Close, and the lack of submission of a Road Safety Audit and tracking data for cars and emergency vehicles, would have an unacceptable impact on highway safety. The proposed development is therefore contrary to Policy DM24 of the Sites and Policies Plan Part 1: Development Management Policies, and paragraph 108 and 1098 of the National Planning Policy Framework.

- 2.7 Following the above, an appeal was submitted (PINS Reference: APP/D0121/W/21/3286677). The Inspector determined that the appeal was to be allowed and outline planning permission granted, on the basis that *"Taking all of the above into consideration, applying the tilted balance pursuant to paragraph 11d of the NPPF, the adverse impacts of granting permission plainly would not significantly and demonstrably outweigh the benefits of doing so. The Council cannot demonstrate a 5YHLS and the overall benefits of the appeal proposals clearly outweigh the harm"*.

Land at Rectory Farm, Chescombe Road, Yatton – 21/P/2791/OUT

- 2.8 An outline planning application (21/P/2791/OUT) was submitted in 2021 for the following description of development, 'Outline planning application for a residential development of up to 75no. dwellings and associated infrastructure following demolition of existing buildings on site, with access for approval and appearance, scale, layout and landscaping reserved for subsequent approval'.
- 2.9 This outline planning application was submitted whilst application 21/P/0236/OUT was being considered at appeal. The appeal was allowed in June 2022 and the judicial review challenge period for the appeal decision expired in September 2022. As such, the applicant withdrew this application in October 2022.

Titan Ladders 195 – 201, Mendip Road, Yatton – 17/P/2377/F

- 2.10 A full planning application (17/P/2377/F) was submitted in 2017 for the following description of development, 'Demolition of existing buildings and erection of 37no. dwellings with associated vehicular access improvements, parking, hard / soft landscape works and drainage'. The application was approved under delegated powers in April 2019, subject to a legal agreement and conditions.

Flood Constraints

- 2.11 The Site lies within Flood Zone 3 according to the EA's Flood Risk Map, as shown on **Figure 2.1** below. It is also in an area benefitting from flood defences.

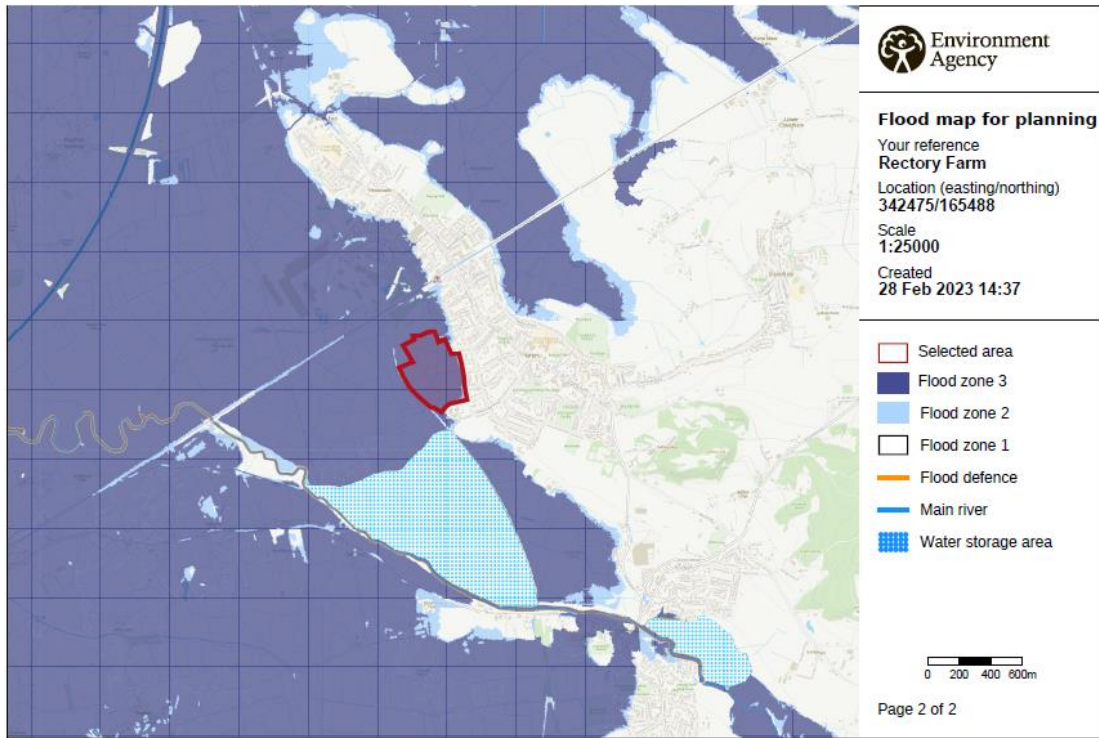


Figure 2.1 – Environment Agency Flood Map for Planning

2.12 The North Somerset Council Local Plan policies map confirms that the Site lies within Flood Zone 3a for Tidal Flooding, as opposed to Flood Zone 3b (functional flooding), as shown on **Figure 2.2**. It is useful to set the context of flood risk and development in the area, as this informs the overall approach to development, flood risk management and the sequential test.

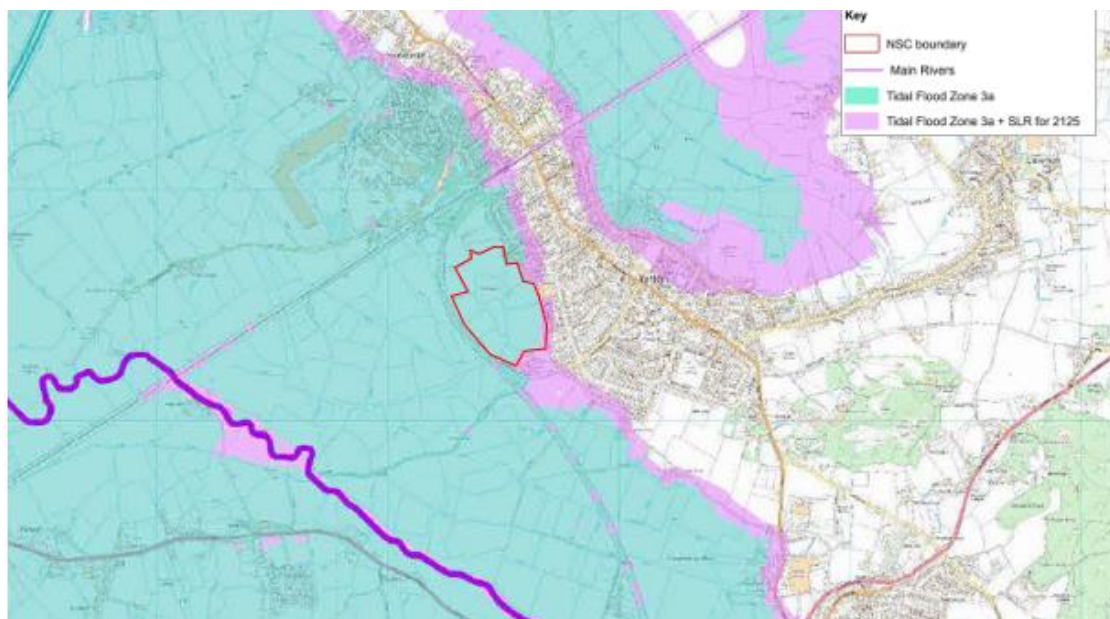


Figure 2.2 – North Somerset Council Policies Map

2.13 A significant proportion of the North Somerset District is within Flood Zones 2 and 3, as shown by the extent of the coverage on **Figure 2.2**. Flood risk is therefore a constraint to development within much of the District and flood defences are required to protect many areas, including the application site. The plan held at **Appendix 2** shows the extent of flood defences within North Somerset and **Figure 2.3** shows defence types and areas benefitting from defences between the Woodspring Bay / Bristol Channel and the Site.

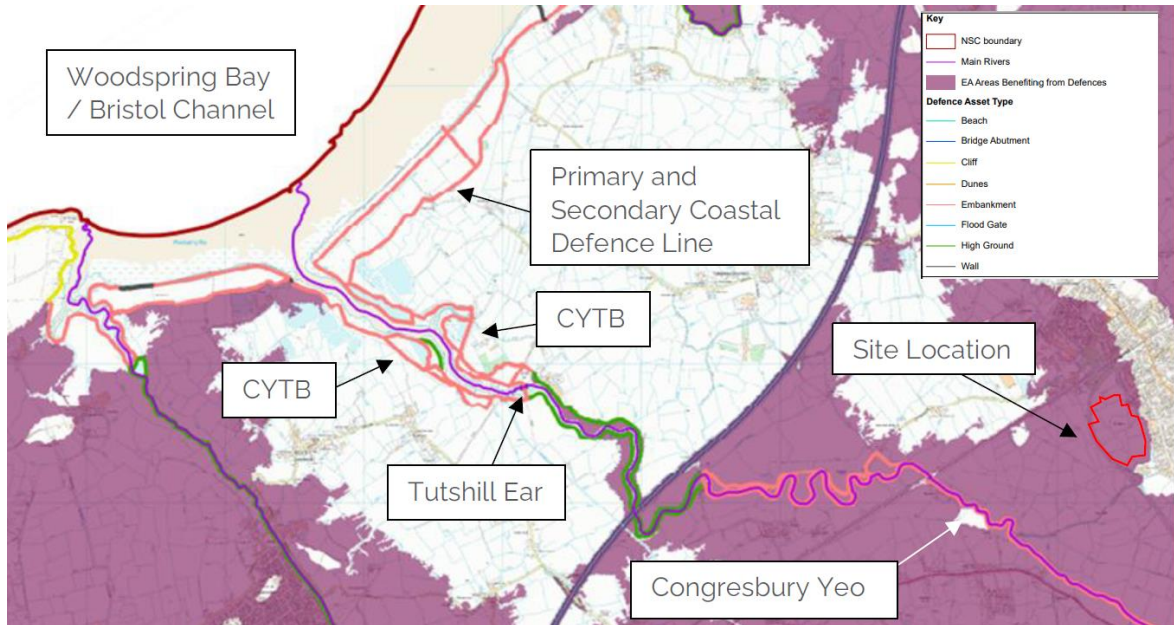


Figure 2.3 - Defence Types and Areas Benefitting from Defences - taken from North Somerset Council Level 1 SFRA Figure 040

The Proposal

2.14 The outline planning application relates to the development of up to 190 dwellings, including 50% affordable housing, 0.13ha of land reserved for Class E uses, in addition to allotments, car parking, earthworks to facilitate sustainable drainage systems, open space and other ancillary infrastructure and enabling works. The means of access from Shiners Elm is detailed for consideration, with all other matters (means of access from Chescombe Road to the south, internal access, scale, layout, appearance and landscaping) reserved for subsequent approval. Further details about the proposed development can be found in **Section 5** of the Planning Statement submitted with this application.

2.15 The built form and development is concentrated to the east of the Site with open space, green infrastructure and ecological buffers located to the west. The topography of the site and existing rhynes have been used to inform the drainage strategy. Sustainable Drainage Systems (SUDS) are proposed within the centre of the Site and details of the drainage strategy are provided within the submitted Foul & Surface Water Drainage Strategy produced by Hydrock.

3.0 PLANNING POLICY CONSIDERATIONS

National Planning Policy Framework (NPPF) 2021

- 3.1 The National Planning Policy Framework ('NPPF') sets out that inappropriate development in areas at risk of flooding should be avoided. Paragraph 162 states that the aim of the Sequential Test is to steer new development to areas with the lowest risk of flooding from any source, and that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 3.2 Paragraph 163 continues, stating that if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the Exception Test may have to be applied. This depends on the potential vulnerability of the site and development proposed, in line with the Flood Risk Vulnerability Classification. Residential development, such as that proposed, is classified as 'more vulnerable' development in Annex 3 of the NPPF.
- 3.3 Paragraph 164 states that the application of the Exception Test should be informed by a Flood Risk Assessment. To pass the Exception Test, it must be demonstrated that:
- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
 - b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall
- 3.4 Both elements of the Exception Test should be satisfied for development to be permitted.

Planning Policy Guidance (PPG)

- 3.5 Planning Policy Guidance ('PPG') was updated on 25th August 2022 to bring it in line with the changes introduced to the NPPF in 2021. There are now clearer requirements for multifunctional SUDS; the Sequential and Exception Tests have been updated to consider surface water; the definition of functional floodplain (Flood Zone 3b) has been changed; and there is increased promotion of Natural Flood Management (NFM) in new developments.

- 3.6 PPG indicates that where necessary, planning authorities should apply the Sequential Test and, if needed, the Exception Test, to ensure that flood risk is minimised and appropriately addressed¹.
- 3.7 Paragraph 024 states that *"The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:*
- *Within medium risk areas; and*
 - *Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas²."*
- 3.8 Paragraph 024 also states that "Initially, the presence of existing flood risk management infrastructure should be ignored, as the long-term funding, maintenance and renewal of this infrastructure is uncertain."
- 3.9 With respect to planning applications, Paragraph 027 states that the Sequential Test should be applied to major development proposed in areas at risk of flooding, and that ***"For individual planning applications subject to the Sequential Test, the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases, it may be identified from other Plan policies. For example, where there are large areas in Flood Zones 2 and 3 (medium to high probability of flooding) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives. Equally, a pragmatic approach needs to be taken where proposals involve comparatively small extensions to existing premises (relative to their existing size), where it may be impractical to accommodate the additional space in an alternative location³."***
- 3.10 Paragraph 028 gives a definition of 'reasonably available sites' as *"those in a suitable location for the **type of development** with a **reasonable prospect that the site is available** to be developed **at the point in time envisaged for the development**. These could include a series of smaller sites and/or part of a larger site if these would be capable*

¹ PPG Paragraph: 004 Reference ID: 7-004-20220825

² PPG Paragraph: 024 Reference ID: 7-024-20220825

³ PPG Paragraph: 027 Reference ID: 7-027-20220825

of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered 'reasonably available' (our emphasis).

- 3.11 PPG is clear that *"the absence of a 5-year land supply is not a relevant consideration for the sequential test for individual applications⁴."*
- 3.12 Paragraph 029 states that *"Relevant decision makers need to consider whether the test is passed, with reference to the **information it holds on land availability**. The **planning authority will need to determine an appropriate area of search**, based on the development type proposed and relevant spatial policies. The applicant will need to identify whether there are any other '**reasonably available**' sites within the area of search, that have not already been identified by the planning authority in site allocations or relevant housing and/or economic land availability assessments, such as sites currently available on the open market. The applicant may also need to check on the current status of relevant sites to determine if they can be considered 'reasonably available' (our emphasis).*
- 3.13 PPG builds on paragraph 164 of the NPPF in terms of Exception Testing. Paragraph 031 explains that it *"is not a tool to justify development in flood risk areas when the Sequential Test has already shown that there are reasonably available, lower risk sites, appropriate for the proposed development. It would only be appropriate to move onto the Exception Test in these cases where, accounting for wider sustainable development objectives, application of relevant local and national policies would provide a clear reason for refusing development in any alternative locations identified"*.
- 3.14 PPG sets out the circumstances where the Exception Test will be required. As the Site lies within Flood Zone 3a and residential development is classified as 'More Vulnerable' development, an Exception Test would be required to support the proposed application, and only *"if the Sequential Test has shown that there are no reasonably available, lower-risk sites, suitable for the proposed development, to which the development could be steered"*, as set out in **Figure 3.1**.

⁴ PPG Paragraph: 028 Reference ID: 7-028-20220825

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

Figure 3.1 – Extract of PPG outlining the need for the Exception Test

North Somerset Core Strategy (2017)

3.15 The North Somerset Core Strategy was adopted in January 2017 and Policy CS3 relates to environmental impacts and flood risk assessments. It states that:

"Development in zones 2 and 3 of the Environment Agency Flood Map will only be permitted where it is demonstrated that it complies with the sequential test set out in the National Planning Policy Framework and associated technical guidance and, where applicable, the Exception Test, unless it is:

- ***development of a category for which National Planning Policy Framework and associated technical guidance makes specific alternative provision; or***
- ***development of the same or a similar character and scale as that for which the site is allocated, subject to demonstrating that it will be safe from flooding, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.***

For the purposes of the Sequential Test:

1. The area of search for alternative sites will be North Somerset-wide unless:

- ***It can be demonstrated with evidence that there is a specific need within a specific area; or***
- ***The site is located within the settlement boundaries of Weston (including the new development areas), Clevedon, Nailsea and Portishead, where the area of search will be limited to the town within which the site is located.***

Other Local Development Documents may define more specific requirements.

2. A Site is considered to be 'reasonably available' if all of the following criteria are met:

- ***The site is within the agreed area of search.***
- ***The site can accommodate the requirements of the proposed development.***
- ***The site is either:***
 - a) owned by the applicant;***
 - b) for sale at a fair market value; or***
 - c) is publicly-owned land that has been formally declared to be surplus and available for purchase by private treaty.***

Sites are excluded where they have a valid planning permission for development of a similar character and scale and which is likely to be implemented."

North Somerset Local Plan 2038 (Emerging)

- 3.16 North Somerset Council are preparing a new Local Plan and carried out consultation on the Preferred Options Plan between March and April 2022. The consultation statement was published in August 2022. Policy DP9 relates to Flood Risk and states:

"All development must consider its vulnerability to flooding, taking account of all sources of flood risk and the impacts of climate change, up to 100 years ahead on residential or mixed use sites and 60 years ahead on non-residential sites.

Applying the Sequential Test where required, proposals for development must seek to avoid development in areas at risk of flooding unless for compatible uses in line with national policy.

Where required, the Exception Test will also be applicable. Flood resilient construction should be utilised to manage any residual risk.

Where either of these tests are required, development will only be permitted where it is demonstrated with clear evidence submitted with the planning application, that the tests are satisfied. The search for alternative sites should not necessarily be restricted to sites only capable of accommodating the proposed scale of development, and opportunities to provide development on more than one, sequentially preferable site should be explored.

In all cases, the precautionary principle will be applied when considering development proposals within areas at current and future risk of flooding." (Our emphasis).

- 3.17 Paragraph 48 of the NPPF advises that Local Planning Authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the plan; the extent to which there are unresolved objections to the relevant policies; and the degree of the consistency with the NPPF. The emerging Local Plan (2038) is only at the Preferred Options (Regulation 18) stage and we therefore consider that the Plan carries, at best, no more than very limited weight in the overall planning assessment or in determining the scope of the Sequential Test. This is discussed in greater detail in the Planning Statement. The methodology has considered this Plan, however the scope of assessment has been

devised giving appropriate weight to the relevant policies, which are summarised in in **Table 3.1**.

Development and Flood Risk Issues Advice Note (2019)

- 3.18 North Somerset Council published a 'Development Management Advice Note' in November 2019 about development and flood risk issues. This articulates government guidance post-dating the 2017 Core Strategy and was given significant weight in the assessment of the Sequential Test by the Inspector in an appeal decision for a site in Portishead, dated February 2022⁵.
- 3.19 The Advice Note states that the area of search for alternative sites will be North Somerset-wide unless:
- It can be demonstrated with evidence that there is a specific need within a specific area. To avoid delay it is recommended that applicants contact the council early in the process to discuss the area of search and evidence of need. A development that includes a mix of uses may need to apply the Sequential Test using different areas of search for the different uses. For the test to be passed, each use within the proposal must pass.
 - The site is located within the settlement boundaries of Weston-super-Mare (including the new development areas), Clevedon, Nailsea and Portishead, where the area of search will be limited to the town within which the site is located.
- 3.20 The Advice Note guides Applicants in what needs to be included in Sequential Tests, as follows:
- The name and location of the site proposed for development and an explanation of why that specific site was chosen.
 - A written statement explaining the area of search.
 - A map identifying all other sites considered within lower areas of flood risk and their planning status.
 - A written statement explaining why the alternative sites listed within lower areas of flood risk are not reasonably available. It is advisable to provide as much evidence as possible regarding statements made on other sites to avoid delays in the planning process.
- 3.21 The Note informs that alternative sites can include sites allocated in a Local Plan or Neighbourhood Plan and that suitable sites that have planning permission for the desired

⁵ PINS ref: APP/D0121/W/21/3279097

use should also be considered. It advises that sites can also be found from the Council's evidence base and background documents to inform the emerging Local Plan, which includes the SHLAA. It states that if alternative sites cannot be identified from such documents, then other sites within the area of search should be considered. NSC recommend that applicants contact them to discuss the availability of sites to be considered in the Sequential Test.

3.22 The Note gives an interpretation of what is meant by 'reasonably available', linking back to Core Strategy Policy CS3, which limits it to sites that the applicant owns or could acquire and excluding alternative sites that have a planning permission likely to be implemented. The Advice Note recognises that between this policy being written and the Note being produced, the Environment Agency published guidance that considers site with permission to be 'reasonably available' and that this approach has been supported at appeal. NSC therefore give greater weight to the national guidance than Policy PG3. The Note therefore states that a site is considered to be 'reasonably available' if **all** of the following criteria are met:

- The site is within the agreed area of search.
- The site can accommodate the requirements of the proposed development. Applicants should consider the potential for splitting the development over more than one site. This will be particularly relevant to sites for housing.
- The site is either:
 - the subject of a valid planning permission for development of a similar character and scale; or
 - identified as having development potential within the required timescale, either in the SHLAA or in a Local Plan policy or supporting evidence; or
 - in the case of small sites, for sale and not subject to known planning constraints.

Planning Policy Summary

3.23 The above shows that there a range of national and local policy and guidance documents which consider the flood risk sequential test and the varying stances presented. This is summarised in Table 3.1 below and has been used to inform the methodology of the Flood Risk Sequential Test, set out in **Section 4**.

3.24 It shows that there is a lack of consistency regarding key components of the Sequential Test which heavily impact on the methodology and quantum of analysis required.

	Search Area	Period of Development: Timescales for Delivery	Reasonably Available	Disaggregation of Sites
NPPF	<ul style="list-style-type: none"> 159: Development should be directed away from areas at the highest risk of flooding. 		<ul style="list-style-type: none"> 162: Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. 	
PPG	<ul style="list-style-type: none"> 027: For individual planning applications subject to the Sequential Test, the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed. 029: The planning authority will need to determine an appropriate area of search, based on the development type proposed and relevant spatial policies. 	<ul style="list-style-type: none"> 028: 'Reasonably available sites' are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development. 	<ul style="list-style-type: none"> 024: Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites: <ul style="list-style-type: none"> Within medium risk areas; and Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas 028: 'Reasonably available sites' are those in a suitable location for the type of development with a reasonable prospect that the site is available 	<ul style="list-style-type: none"> 028: These [reasonably available sites] could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered 'reasonably available'.

	Search Area	Period of Development: Timescales for Delivery	Reasonably Available	Disaggregation of Sites
			to be developed at the point in time envisaged for the development.	
North Somerset Core Strategy	<ul style="list-style-type: none"> • The area of search for alternative sites will be North Somerset-wide unless: <ul style="list-style-type: none"> ○ It can be demonstrated with evidence that there is a specific need within a specific area; or ○ The site is located within the settlement boundaries of Weston (including the new development areas), Clevedon, Nailsea and Portishead, where the area of search will be limited to the town within which the site is located. • A Site is considered to be 'reasonably available' if all of the following criteria are met: <ul style="list-style-type: none"> ○ The site is within the agreed area of search. 		<ul style="list-style-type: none"> • A Site is considered to be 'reasonably available' if all of the following criteria are met: <ul style="list-style-type: none"> ○ The site is within the agreed area of search. ○ The site can accommodate the requirements of the proposed development. ○ The site is either: <ul style="list-style-type: none"> a) owned by the applicant; b) for sale at a fair market value; or c) is publicly-owned land that has been formally declared to be surplus and available for purchase by private treaty. • Sites are excluded where they have a valid planning permission for development of a similar character and 	<ul style="list-style-type: none"> • A Site is considered to be 'reasonably available' if all of the following criteria are met: <ul style="list-style-type: none"> ○ The site can accommodate the requirements of the proposed development.

	Search Area	Period of Development: Timescales for Delivery	Reasonably Available	Disaggregation of Sites
			scale and which is likely to be implemented.”	
North Somerset Draft Local Plan 2038				<ul style="list-style-type: none"> The search for alternative sites should not necessarily be restricted to sites only capable of accommodating the proposed scale of development, and opportunities to provide development on more than one, sequentially preferable site should be explored.
Development and Flood Risk Issues and Advice Note	<ul style="list-style-type: none"> North Somerset wide unless: <ul style="list-style-type: none"> There is evidence need in a specific area; or Site is in the settlement boundaries of Weston-super-Mare, Clevedon, Nailsea or Portishead. 		<ul style="list-style-type: none"> If ALL of the following criteria are met: The site is within the agreed area of search. The site can accommodate the requirements of the proposed development. Applicants should consider the potential for splitting the development over more than one site. This will be particularly relevant to sites for housing. The site is either: <ul style="list-style-type: none"> the subject of a valid planning permission for development of a 	<ul style="list-style-type: none"> Applicants should consider the potential for splitting the development over more than one site. This will be particularly relevant to sites for housing.

	Search Area	Period of Development: Timescales for Delivery	Reasonably Available	Disaggregation of Sites
			similar character and scale; or <ul style="list-style-type: none"> ○ identified as having development potential within the required timescale, either in the SHLAA or in a Local Plan policy or supporting evidence; or ○ in the case of small sites, for sale and not subject to known planning constraints. 	

Table 3.1 – Policy and Guidance Summary

4.0 METHODOLOGY

- 4.1 In accordance with the policy and guidance outlined in Section 4 of this report, it is necessary to define the parameters of the Sequential Test. The Applicant has to identify where there are any other 'reasonably available' sites within the search area, that have not already been identified by the planning authority in site allocations or relevant housing assessments, such as sites currently available on the open market.
- 4.2 As part of the pre-application enquiry submitted to North Somerset Council, which is discussed in further detail in the Planning Statement, the Applicant requested specifically input into the approach and methodology for the Flood Risk Sequential Test, as the Council has not produced a methodology to assist Applicants. Other than advising that it should be district-wide, no further guidance was provided. In the absence of a timely response from the enquiry, the Applicant presented a draft methodology for comment by North Somerset Council on 12 December 2022. No response has been forthcoming at the time of writing.

Geographical Area

- 4.3 PPG sets out that the planning authority will need to determine the appropriate area of search, based on the development type proposed and relevant spatial policies. The Core Strategy states that the search area for alternatives sites will be North Somerset-wide unless there is specific need within a specific area, or the site is within the settlement boundaries of Weston, Clevedon, Nailsea and Portishead.
- 4.4 This Sequential Test covers the whole administrative area of North Somerset, therefore a thorough and comprehensive assessment has been undertaken.
- 4.5 This Report also identifies, in addition to the District-wide analysis, the circumstances specific to Yatton and the need for housing within this Service Village settlement in particular, with due regard to flood risk.

Flood Risk Discounting

- 4.6 Sites with the same or higher flood risk (i.e part or all of the site lies within Flood Zone 3b or lies within Flood Zone 3a and does not have flood defences) have been discounted as alternative sites. They would not present a better scenario in terms of flood risk from the application site, which lies in Flood Zone 3a and benefits from flood defences. This is what the Sequential Test strives to achieve. Therefore, only sites in Flood Zones 1 and 2, and site in Flood Zone 3a with flood defences are assessed as part of the Sequential Test.

4.7 This Sequential Test has also considered the updated tidal model: the Woodspring Bay Model, to assess flood risk within North Somerset. This is explained in greater detail within the Flood Risk Assessment & Hydraulic Modelling Report and the Foul & Surface Water Drainage Strategy produced by Hydrock.

Site Capacity

4.8 The current Core Strategy states that a site can be considered to be reasonably available if it can accommodate the requirements of the development, whereas the Preferred Options version of the emerging Local Plan states that the search should not necessarily be restricted to sites only capable of accommodating the proposed scale of development. As outlined above, only very limited weight should be attributed to the Emerging Local Plan.

4.9 PPG also states that 'reasonably available sites' could include a series of smaller sites and/or parts of a larger site, if these would be capable of accommodating the proposed development.

4.10 The assessment of each site will include:

- Its name and address;
- Whether it has been allocated plan (including for a specific use);
- Issues which would prevent development and whether these could be overcome;
- Estimation of capacity;
- Status within the Local Plan;
- Supporting documentation about alternative sites.

4.11 An appeal decision in Framlington, within East Suffolk⁶ issued in September 2020 considers the range of sites to be assessed as part of the Sequential Test at paragraph 11, stating that ***"The standard approach to these matters is to set a range within a certain percentage of the application site, usually 15 or 20% either way."***

4.12 It is noted that the East Suffolk appeal decision pre-dates the August 2022 PPG updates, and therefore should be considered in the context of up-to-date local and national policy and guidance.

4.13 The application site is 13.79ha and outline permission is sought for up to 190 dwellings. When considering the parameters outlined in the East Suffolk appeal decision, and that PPG states that smaller or larger sites could be included, we consider it would be appropriate to consider sites with a 25% allowance above and below the site area and number of dwellings proposed. As such, only sites (or grouping of sites, as explained at

⁶ PINS reference: APP/X3540/W/20/3250557

para 4.16 below) between **10.3ha and 17.2ha in size** and which can accommodate a quantum of between **143 and 237 dwellings** have been assessed in this Sequential Test.

Site Availability

4.14 The Application Site is expected to be delivered as follows:

- 1st April 2023 – 31st March 2025 – Obtain full planning permission (Outline and Reserved Matters)
- First completions in 2025:
 - 2025/26 – 65 houses
 - 2026/27 – 60 houses
 - 2027/28 – 60 houses
 - 2028/29 – 55 houses

4.15 Thus, development would commence in 2025 and be completed in full within 5 years. For the purpose of this assessment, we are therefore looking for sites which are available to come forward for development immediately in order to achieve the same development timescales and meet housing need. As evidenced elsewhere within this report and the Planning Statement, there is an established and significant need for both market and affordable housing in North Somerset. Sites which are available but not able to come forward in the intended timeframes are therefore not available at the point in time envisaged for the development. This is with the acknowledgement that the Applicant is a national housebuilder and is willing to commit to a planning condition requiring the swift submission of reserved matters (within 12 months of the grant of outline planning permission) to ensure this programme is achieved.

Summary

4.16 This scope considers sites against the above criteria:

- It is confirmed that sites across the North Somerset District will be considered, with circumstances relevant to Yatton specifically also considered.
- Sites will be filtered out based on their Flood Risk status, with only sites in Flood Zones 1 and 2, and defended sites in Flood Zone 3a assessed. Undefended Flood Zone 3a sites and those in Flood Zone 3b will also be discounted.
- Sites which are in the Green Belt, AONB or which are not physically connected to an existing settlement identified in the Local Plan will be discounted.
- Delivering this development on a single site will require land of between 10.3ha and 17.2ha in size, capable of accommodating 143 to 237 dwellings.

- The assessment will also need to consider, within reason, where smaller sequentially preferable sites could be grouped together to deliver the same quantum or whether part of a larger site could be used. Sites of 10 dwellings or over will be considered. However when considering this route, the site(s) need to be capable of delivering the scheme as a whole which includes market and affordable housing (affordable housing being provided at 50%); land for Use Class E; allotments and substantial open space.
- The ability to deliver the development on larger sites will be considered however only sites which are available immediately (and where a full planning permission can be achieved by 31st March 2025 for the whole scheme) will be considered.

4.17 Sites which fall outside of these parameters have been discounted and have not been assessed as part of the Sequential Test. This scope of assessment is in line with national and local policy and guidance.

4.18 The assessment of sites within the Sequential Test is based on the January 2022 SHLAA, sites that have been allocated in the North Somerset Local Plan and sites that benefit from planning permission. We consider this approach will form a robust assessment of reasonably available sites, to be analysed as part of the Test and inform the overall conclusions of the Assessment.

4.19 The latest Housing Land Supply data, as outlined in the most recent Annual Monitoring Report and appeal decisions from 2022, is shown to be at 3.5 years meaning there is a shortfall of over 2,000 homes. It is necessary for this to be considered as part of the sequential testing as additional sites need to be sought to deliver the housing requirement for North Somerset. This following section will explain how the proposed development on the application Site is one of the most sequentially preferable sites for residential development to come forward to fill the 'headroom' between the supply and requirement, and that the Site is the most sequentially preferable site for the proposal of 190 homes with 50% affordable housing, land for Use Class E and other benefits including extensive public open space, allotments and biodiversity benefits.

5.0 THE SEQUENTIAL TEST

- 5.1 This Flood Risk Sequential Test work has considered a total of 364 sites across North Somerset, using information from the 2022 Strategic Housing Land Availability Assessment; the April 2021 Housing Land Supply trajectory; planning applications decided since April 2021; sites allocated in the Development Plan; and sites proposed as draft allocations in the Preferred Options Consultation Draft of the Local Plan 2038 (March 2022). This data provides a thorough review of potential sites for development within the District.
- 5.2 As outlined in **Section 4**, sites have first been assessed against flooding and spatial constraints and then against a range of factors in line with the parameters discussed above relating to deliverability of the proposed development at the intended time. Sites which have not been discounted on these grounds are considered in further detail and assessed individually later in this report.

Core Planning Constraints

- 5.3 The Application Site lies within Flood Zone 3a and benefits from flood defences, therefore all undefended sites in Flood Zone 3a and all sites in Flood Zone 3b have been discounted as they would not present a sequentially preferable scenario to the Site.
- 5.4 Sites have then been considered against 'showstopper' constraints, such as being located within the Green Belt, an Area of Outstanding Natural Beauty (AONB) or not being physically connected to an existing settlement. Such sites have been discounted on the basis that there would need to be a review of designations through the Plan Making process, rather than through the Decision Making process and as they may require other developments to come forward in advance to ensure they are connected to settlements.
- 5.5 **Section 4** explains that the development of the Application Site is expected to commence in 2025 and be fully completed in 5 years. The Applicant is therefore willing to accept a shortened time frame for the submission of the Reserved Matters to ensure this is achieved. As such, the Applicant requires a site which can come forward for development immediately in order to achieve the same development timescales and meet housing need.
- 5.6 Whilst Green Belt release is proposed in the Preferred Options Plan (March 2022), the release of sites from the Green Belt through the local plan process has uncertain timescales. The Regulation 19 Plan was due to be issued for consultation in November 2022, then an updated LDS was released in November advising that consultation would be in April / May 2023. In December 2022, following the Government's announcement to make further changes to the planning system, North Somerset Council made the decision to await

clarity before finalising a revised version of the Local Plan. Consultation is now not expected on the Regulation 19 Plan before Summer 2023.

- 5.7 Based on the timescales issued by North Somerset Council in 2022, it was anticipated that the Emerging Local Plan would be adopted in December 2023. However this timeline has been delayed.. This delay has implications for the stages of plan preparation alongside forthcoming changes to planning policy. Should a Plan be adopted which included Green Belt releases then it is reasonable to assume a minimum of 15 months' delay in its adoption.
- 5.8 Sites within the Green Belt, AONB or not connected to a settlement would therefore not be 'reasonable available' in accordance with the PPG (Paragraph 028⁷) as there would not be a reasonable prospect that the site is available to be developed at the point in time envisaged for the development.

Delivery Timescale

- 5.9 Some sites within the January 2022 SHLAA contained details about the expected delivery timescales. Sites which were wholly expected to be delivery in six or more years were discounted on the basis of not being reasonably available at the time envisaged for development.

Site Availability

- 5.10 The April 2021 Housing Trajectory provides details about where development had already commenced on site at the base date and the residual capacity of such sites. Where a developer has full planning permission for a scheme and homes have been constructed and completed, it is considered unlikely that parts of those site would later become available. It would also be unlikely that the development proposed as part of this application could be delivered on a partially completed site given size and mix of the proposal and the quantum of open space and affordable housing proposed.
- 5.11 As such, sites that were included in the April 2021 housing trajectory under the 'large sites with detailed planning consent' section and had significant numbers of dwellings under construction and/or completed were discounted. This assessment was not applied to the strategic Weston Village sites, which are assessed in greater detail further in this report.

⁷ PPG Paragraph: 028 Reference ID: 7-028-20220825

Site Capacity

- 5.12 The PPG sets out that development should be considered to be built out across various smaller sites, or as one part of a larger site. Given the benefits that the development is proposing, including 50% affordable housing, a mixed use community building, allotments and substantial open space, parameters are needed for discounting smaller sites, as outlined in **Section 4**.
- 5.13 The benefits that the proposed development will bring cannot be spread across an undefined number of sites and therefore disparate development is not appropriate. Smaller sites which cannot accommodate 143 units were discounted unless they could be grouped together with other sites. As such, smaller sites which sit in isolation were discounted as not being available to deliver the type of development proposed here, in line with Paragraph 028 of the PPG. This is a sensible, pragmatic approach.
- 5.14 A spatial exercise was undertaken whereby the 364 sites considered were assessed based on their location and proximity to other sites. If two or more smaller sites are located close together and could accommodate 143 units cumulatively, they were considered as one larger site, rather than several smaller ones. This ensures that all sites which could reasonably accommodate the proposed development were fully considered and to ensure that smaller parcels of land were not discounted purely for administration reasons.
- 5.15 Policy CS16 (Affordable Housing) of North Somerset's Core Strategy requires proposals of 10 or more dwellings to provide 30% affordable housing. Sites with a capacity of fewer than 10 homes therefore do not attract an affordable housing requirement. These sites have not been considered as part of this assessment because the delivery of up to 95 affordable homes, as proposed with this application, would not realistically be able to be provided on such small sites which do not attract a provision.

Detailed Assessments

- 5.16 The above exercises discounted a total of 214 sites from the 364 that are included within the Applicant's list of sites. A full breakdown of these sites, their location and reasons for discounting is held at **Appendix 3** where there are 146 sites and groups of sites, to account for sites in close proximity assessed together.
- 5.17 A total of 150 of the 364 sites were not discounted on the grounds outlined above and were carried forward to greater stages of assessment. These are 49 sites and groups of which were analysed and assessed in further detail below, by settlement. **Table 5.1** shows

a summary of these sites and the assessment. Full details and analysis of each site are held at **Appendix 4**.

- 5.18 The assessment of these sites highlight the requirements of the proposal. This application is proposing 50% affordable housing, for which there is a significant need in North Somerset, a total of 8.957 hectares of Green Infrastructure including woodlands and allotments, which will benefit existing and future communities, land for Use Class E and many other benefits. As such, such a high quality scheme cannot be disparately spread across an undefined number of smaller sites as the benefits would not be achievable or deliverable. As such, this assessment has been carried out with due regard to the proposal to conclude that the Site is the preferable location for the development.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
Backwell							
Moor Lane	45, 46, 49, 62			22/P/0252/OUT	4.64	145	<ul style="list-style-type: none"> Existing planning application recommended for refusal on highway safety grounds. Sites combined together are below the lowest size parameter and are therefore too small for the proposed development. Site is located in the North Somerset and Mendip Bats SAC Zone A therefore appropriate mitigations could reduce capacity.
Grove Farm	55, 66, 356					600	<ul style="list-style-type: none"> Access would be required from Moor Lane and as outlined above there are existing issues that have not been resolved on this road. Part of the site is designated as Green Belt. Detached from the main settlement. Site is located in the North Somerset and Mendip Bats SAC Zone A

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							therefore appropriate mitigations could reduce capacity.
Farleigh Farm	55, 61, 282	HE20212 HE20486		21/P/1766/OUT	21.65	256	<ul style="list-style-type: none"> Part of the site (125 dwellings) already being brought forward by PHSV however it does not include 50% affordable housing or land for Use Class E. Remainder of site has agricultural access only Designated as Local Green Space Remaining capacity too small to accommodate the proposal.
Banwell, Bleadon, Hutton, Locking, Uphill and Weston-super-Mare							
Ebdon Road and Lyefield Road	87, 90, 94, 95, 97, 257	HE2027 HE20354 HE20471 HE20493 HE20495	4/443	21/P/3529/OUT	56.81	1,257	<ul style="list-style-type: none"> Part of the site located in Flood Zone 3 without defences. Parts of the site are separated by roads making disjointed land masses. Access issues would prevent delivery in the anticipated time frame. Part of the site is coming forward separately.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
Land at Bourton	96	HE20494			68.48	1,050	<ul style="list-style-type: none"> Site is within Flood Zone 3 and doesn't benefit from flood defences. This is less sequentially preferable than the application site. Site is within close proximity to the railway line and M5 so there are concerns about noise and air pollution.
Herluin Way (Avoncrest)	264		4/594			750	<ul style="list-style-type: none"> Site allocated for a mixed use development including employment provision. Concerns relating to contamination issues which would need to be overcome and would likely impact on viability, deliverability and timescales.
South of Locking Moor Road (Oaktree Park and Elm Grove Nurseries)	80, 101, 103, 345	HE201037 HE207 HE208		18/P/2652/OUT	20.1	364	<ul style="list-style-type: none"> Most of this land is located within the strategic gap and there has been a refused application and dismissed appeal on part of the site for harm to the strategic gap.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<ul style="list-style-type: none"> Part of the site is in employment use with a draft allocation for employment. A small part of the site has a draft allocation for residential, however this cannot accommodate the proposal. Site is not available for the proposal.
Woodspring Stadium and Winterstoke Road	258, 348	HE20433	4/591	21/P/2190/OUT		234	<ul style="list-style-type: none"> There is a sports facility on site which would require relocation, therefore development on this land could not be at the time envisaged. The site capacity relies on the development of flats which is not the type of housing proposed with this application. The proposal therefore cannot be delivered on this site at the time envisaged.
Knightcott Gardens and Western Trade Centre	120, 125, 126, 221, 360	HE201050 HE20358 HE2098	4/630	15/P/0968/O 15/P/0248/O 16/P/0753/O 17/P/2111/O 18/P/3180/OUT	7.54	144	<ul style="list-style-type: none"> The combined site size is below the lower parameter for the proposal.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
				20/P/2257/OUT 13/P/0425/O			<ul style="list-style-type: none"> There is a history of refused planning applications and dismissed appeals on grounds of harm to character and appearance, impact on landscaping and impact on AONB. Future applications are also likely to be refused whilst assessed against the same policies. The allocated part of the site is for 37 dwellings only and cannot accommodate the proposal.
Gas Works	263, 304	HE20710	4/611			95	<ul style="list-style-type: none"> Capacity estimate reduced from 240 in SAP to 95 in the emerging plan. This appears to take account of the site constraints including proximity to the A370, noise issues, contamination. The site therefore cannot accommodate the proposals and any development would require mitigation

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							measures which can be timely.
Station Gateway and Weston Rugby Club	261, 347		4/645			550	<ul style="list-style-type: none"> • These sites are separated by roads and railway and a development spread across the sites would be disjointed and disconnected. • Capacities likely to be reduced by constraints including contamination, air quality and noise issues. • Southern most site would require the relocation of sports facilities which is a timely process. • The sites are therefore not suitable for the proposal or available at the intended time.
Dolphin Square	269		4/650			80	<ul style="list-style-type: none"> • Capacity estimate reduced from 220 dwellings in the SAP to 80 in the emerging plan. • The town centre location could not accommodate the significant open space and biodiversity benefits of the proposal.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<ul style="list-style-type: none"> The site cannot accommodate the proposal.
M5 J21: West of Wolvershill Road and north of Wolversill Park	238		4/703	18/P/4735/OUT 21/P/1735/RM		54	<ul style="list-style-type: none"> The site capacity is below lower parameter for the proposal and is separated from other available land. A planning application is also being progressed however for a different scheme. The site is not available for the proposal.
M5 J21: Sites at Wolvershill, north of Banwell	8, 9, 10, 11, 13, 14, 15, 16, 18, 342	HE201016 HE201034 HE201086 HE202000 HE20500 HE20592 HE20594 HE20607				2,800	<ul style="list-style-type: none"> The sites cover a substantial area largely covered by a draft allocation which requires a single masterplan and supporting design codes to be prepared with a phasing strategy. The site is therefore not available for the proposed development and within the intended timescales.
M5 J21: Land east of J21	12	HE20496			154.51	2,000	<ul style="list-style-type: none"> The site covers a substantial area and would have to come forward as a long term strategic development.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<ul style="list-style-type: none"> • There are also noise, air quality and access constraints. • The site would not be available for the proposal at the timescales envisaged.
M5 J21: East of Banwell at Eastermead Lane and Riverside	121, 124	HE201056 HE20195			6.42	445	<ul style="list-style-type: none"> • Site partially intersected by the proposed Banwell Bypass significantly reducing capacity. The bypass proposals also create access issues. • The sites could not accommodate the proposal in the envisaged timeframes.
M5 J21: Land to the east of Wolverhill Road, Goding Lane and Orchard Close	17, 122, 123	HE20603 HE201056 HE201075			15.4	444	<ul style="list-style-type: none"> • These sites have access constraints and are separated by unavailable land. Separately the sites could not accommodate the proposal. • Banwell Bypass intersects part of the sites reducing capacity and splitting sites further. • The sites are therefore not capable of accommodating the proposal.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
Land at Elborough	78, 86, 100	HE201025 HE20237 HE20637			28.23	626	<ul style="list-style-type: none"> Land at Bury Farm is close to but does not abut the other land therefore development across this area would be disjointed and disconnected. The land to the north of Banwell Road and at Devils Elbow Farm do not adjoin any settlement boundaries (existing or proposed). Southern sites abut the AONB so more sensitive and any development could lead to harm. The sites are therefore not available as suitable for the proposal at the time envisaged.
Oldmixon Road	77, 83, 203, 286	HE2010113 HE201094	4/664	16/P/0150/O 20/P/0377/RM		130	<ul style="list-style-type: none"> The site has outline and RM permission for residential development which is under construction and therefore not available. The site is also below the minimum capacity requirements for the proposal.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
Land off Bridge Road and at Bleadon Quarry	127, 240	HE201021	4/586				<ul style="list-style-type: none"> The land at Bleadon Quarry has permission for 42 dwellings is being brought forward separately to the land off Bridge Road. The land at Bridge Road alone has a capacity of 150 dwellings however is not large enough (6.18 hectares) to accommodate the proposals. There has also been a refusal and dismissed appeal for an application for residential development. The sites therefore cannot accommodate the proposal.
Parklands Village: Locking Parklands	241, 346		4/558a-c	09/P/1614/F 12/P/0760/F 13/P/0997/OT2 15/P/1777/RM 17/P/5631/RM 18/P/2925/RM 19/P/0032/RM 21/P/3241/RM		1,450	<ul style="list-style-type: none"> Parts of the strategic allocation have been approved and built. The outstanding capacity relating to the outline permission is 767 dwellings, however this application only accounts for a 30% provision of affordable housing. The proposed development is materially

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							different to the consented scheme as it includes 50% affordable housing with land for Use Class E and other benefits including open space and allotments.
Parklands Village: South of Locking Head Drive	243		4/558e			700	<ul style="list-style-type: none"> Part of the site has reserved matters approval which is being advanced by another developer and therefore not available. The delivery of this land is crucial to unlocking the remaining land, which currently does not have an access. This application proposes 50% affordable housing, whereas the extant permission only accounts for 30%, which are materially different proposals. The site cannot accommodate the proposal at this time.
Parklands Village: Moss Land	244		4/558f	16/P/1881/OT2 19/P/1563/RM		300	<ul style="list-style-type: none"> This development has been substantially completed and is

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							therefore not available for the proposal.
Parklands Village: Churchland Way and Mead Fields	76, 92, 242	HE2010111 HE2039	4/558d and 4/558g	12/P/1266/OT2 17/P/5586/RM 18/P/5209/RM 18/P/5231/RM 20/P/3081/RM 16/P/2744/OT2 19/P/2662/RM		1,400	<ul style="list-style-type: none"> Sites with reserved matters approval are being brought forward by other developers and therefore not available to the Applicant. The landowner retaining the remaining capacity outlined in 2022 that they had no intention of bringing further land forward in the next 5 years. Conditions and obligations relating to ground conditions and access constraints need to be addressed, meaning the site could not be developed in the intended time period. This application proposes 50% affordable housing, whereas the extant permission only accounts for 30%. The site is therefore not available for the proposal at the time envisaged.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<ul style="list-style-type: none"> The other available land not covered by the outline applications is not of the capacity to accommodate the proposal.
Land to the west of the M5, East of Trenchard Road and West of Trenchard Road	234, 349		4/702	18/P/3038/OUT 22/P/1860/RM		75	<ul style="list-style-type: none"> The site is below the lower parameter for the proposal and not adjacent to other available land.
Locking Farm	88	HE2032			16.38	495	<ul style="list-style-type: none"> Part of the site has permission for a school which reduces the capacity and of the remaining land and separates it from the wider allocation. The remaining land is partially located in Flood Zone 3b and is therefore sequentially worse than the application site on flood risk grounds.
Weston Villages: Winterstoke Village	246, 247		4/558h 4/568	10/P/0756/OT2 13/P/0834/RM 14/P/2723/RM 15/P/2437/RM		2,550	<ul style="list-style-type: none"> The Applicants are the developers of this site. A phasing plan is provided at Appendix 5.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
				15/P/2570/RM 16/P/1842/RM 12/P/1510/OT2 18/P/2337/RM 18/P/2867/RM 20/P/2026/RM 22/P/2427/RM			<ul style="list-style-type: none"> The first phase of development is substantially completed and the second phase has an outstanding balance of 701 homes without reserved matters approval. The residual land is required to provide 30% affordable housing and the proposed development is for 50% affordable housing. The remaining land at this allocation is therefore not suitable for the proposal at the time envisaged.
Churchill, Sandford, Winscombe							
Says Lane	132, 136, 137, 141,	HE201013 HE20122 HE20196 HE20629		17/P/2344/O 22/P/0564/OUT	16.4	408	<ul style="list-style-type: none"> Sites split by road and would create disjointed development. All sites subject to constraints reducing capacity below requirement. Site to the east of Says Lane was subject to a refusal and dismissed appeal on reasons

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<p>including landscape impact.</p> <ul style="list-style-type: none"> Sites to the east would not meet the required site area (5.55ha) and could not accommodate proposed quantum with constraints. Sites to the west of Says Lane cover a land area which meets the requirements (10.85ha) however site constraints and current planning application indicate a significantly lower capacity than indicated in the SHLAA.
Pudding Pie Lane	134, 138, 208, 277, 332, 361	HE201074 HE2023	4/634 4/651	15/P/1414/O 17/P/1894/RM 15/P/2521/O	7.36	191	<ul style="list-style-type: none"> The allocated land to the east has been implemented and therefore not available. The remaining capacity which covers four draft allocations in the emerging plan covers a site area of 7.36 hectares. Whilst the sites have an estimated capacity of 191 dwellings, this site area is considerably below the

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<p>lower parameter of 10.3 ha set out in the methodology. This is needed to deliver the significant benefits proposed.</p> <ul style="list-style-type: none"> The site is therefore not capable of accommodating the proposed development.
North of Sandford	174	HE20587			12.97	259	<ul style="list-style-type: none"> Site part of operational business for Thatcher's Cider Brewery. Development on this site would mean the loss or relocation of the business which would be a lengthy process. Access concerns for proposed quantum of development. Site constraints would reduce capacity.
Claverham							
Brockley Way and Dunsters Way	107, 108	HE201072 HE201076		15/P/0185/O	8.53	300	<ul style="list-style-type: none"> The combined site size is below the lower parameter for the proposal of 10.3ha which is required to deliver the

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<p>benefits of the significant proposal.</p> <ul style="list-style-type: none"> • Number of constraints on site that would likely reduce the capacity, including being located in the North Somerset and Mendip Bats SAC Zone A. • Planning application withdrawn for unknown reasons.
Clevedon							
Land east of Clevedon	1	HE30236			199.7	2500	<ul style="list-style-type: none"> • Large site that would have to come forward in a phased and strategic manner. • No support in the emerging plan. • Close proximity to the M5 and unclear how safe and suitable access would be achieved. • Site constraints such as noise and listed buildings would restrict development. • Not a reasonable prospect of site coming forward in envisaged timeframes.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
North of Colehouse Land and west of Kenn Road	3, 5	HE20208 HE2036		16/P/1901/O	26.43	524	<ul style="list-style-type: none"> The sites are detached from the settlement by the River Blind Yeo. The land to the north of Colehouse Land is partially occupied by a caravan park which has a long term lease, reducing the developable area by approximately half and therefore below the minimum area required. The land to the west of Kenn Road is allocated for employment and a residential application has been refused previously based on this allocation and being an unsustainable location. Site constraints restrict developable areas.
Congresbury							
East of Brinsea Road	151, 152, 153, 154	HE202011 HE20303 HE20304 HE20305		16/P/1707/O	12.57	440	<ul style="list-style-type: none"> Planning application on land adjacent to settlement refused on landscape grounds and dismissed at appeal. The Development Plan is unchanged since the decision therefore this

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<p>and land further from the settlement also likely to raise landscape objections.</p> <ul style="list-style-type: none"> • Not deliverable at expected timescale.
Wrighton Road and Cobthorn Farm	150, 165, 235, 330	HE202010 HE20651	4/659	16/P/1521/OUT 19/P/1657/RM 15/P/0519/O 18/P/3708/RM	18.29	347	<ul style="list-style-type: none"> • Northern parcel has planning permission for 50 homes, is allocated and is under construction. It is therefore not available for the proposal. • Western parcel is allocated for 38 homes and has a permission for this amount. • The remaining capacity of the wider site is 259 homes however significant parts are in Flood Zones 3a and 3b. • Site is located in the North Somerset and Mendip Bats SAC Zone A therefore appropriate mitigations could reduce capacity. • The site is therefore not available on capacity grounds and is not sequentially preferable on flood risk grounds.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
Land south of Wood Hill	148, 149, 162, 163, 164	HE20177 HE20178 HE20490 HE20502 HE2061		22/P/1142/FUL	9.28	284	<ul style="list-style-type: none"> • Site area is below lower parameter for the proposal. • Access is not possible from Wood Hill due to being a single carriageway with capacity issues. • Western most parcel has permission for 47 homes, access to remaining land required through this site. • Site is located in the North Somerset and Mendip Bats SAC Zone A therefore appropriate mitigations could reduce capacity. • Site not available for proposal at time envisaged due to access restrictions and reliance on development to west.
West of Smallway	147	HE20176			6.74	202	<ul style="list-style-type: none"> • Site area is below lower parameter of 10.3ha required for the proposal. • Site is within the strategic gap between Yatton and Congresbury. • Site detached from settlement.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<ul style="list-style-type: none"> Site is located in the North Somerset and Mendip Bats SAC Zone A therefore appropriate mitigations could reduce capacity. Site is not available for development at the time envisaged.
Park Farm and Pineapple Farm. East of Congresbury	156, 160, 362	HE20307 HE20375		22/P/0459/OUT	9	249	<ul style="list-style-type: none"> Site area is below lower parameter of 10.3ha required for the proposal. Southern parcel is a draft allocation with pending planning application. Site constraints restrict developable area. Parts of the site lie within Flood Zone 3b. Site is located in the North Somerset and Mendip Bats SAC Zone A therefore appropriate mitigations could reduce capacity. Site not capable of delivering the proposal and not sequentially preferable on flood risk grounds.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
West of Brinsea Road	143, 155	HE201024 HE20306		14/P/1901/O	21.06	443	<ul style="list-style-type: none"> Parcel closest to the settlement refused permission and appeal dismissed on grounds of impact on character and appearance and inappropriate location. Wider area extends further beyond the settlement therefore reasons would apply to whole area. Site not considered to be available at the time considered for development.
Drove Road and Rookery Farm	144, 159, 166	HE201029 HE20310 HE2092			7.11	118	<ul style="list-style-type: none"> Site area and capacity are below lower parameter for the proposal. Site occupied by playing fields and allocated in Neighbourhood Plan as Local Green Space therefore mitigation would be required. Site would not be available for development at the envisaged time.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
Edge of Bristol / Barrow Gurney / Long Ashton							
Barrow Hospital / Barrow Wood	19, 228, 229, 339	HE201059	4/662 4/663	15/P/2301/F 15/P/2302/F	75.43	200	<ul style="list-style-type: none"> The sites are wholly within the Green Belt. Capacity allocated in the SAP and emerging plan is only for 80 dwellings and therefore cannot accommodate the proposal. Site is not available for the proposal at the time envisaged.
Nailsea							
Youngwood Lane and south Nailsea	50, 71, 73, 231, 252, 317, 319,	HE201080 HE2065 HE20703	4/596 4/640	16/P/1677/OT2 20/P/2000/R3 20/P/2347/RM 22/P/1558/RM		508	<ul style="list-style-type: none"> Land at the Uplands and St Mary's Grove has capacity for a total of 58 dwellings. These sites are 'locked in' and cannot accommodate the proposal. To the south is a draft allocation for 450 dwellings with outline consent. Phase 1 is being built by Taylor Wimpey and Phase 2 is being progressed. The sites are therefore not available to the Applicant as another

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<p>housebuilder is developing.</p> <ul style="list-style-type: none"> The remaining capacity at Phase 3 (65 homes) cannot accommodate the proposal.
South of Nailsea	65, 68, 75, 290, 353	HE20591 HE20612 HE202016		20/P/0861/FUL	43.93	600	<ul style="list-style-type: none"> Site area is above the higher parameter for the proposal. Site would have to come forward as part of a larger phased and strategic proposal as land adjacent to the settlement does not abut the public highway. The site would not be suitable for the proposal at the time envisaged. Smaller parcel of land on the opposite site of Youngwood Lane has a capacity of 14 dwellings and couldn't accommodate the proposal.
West End, Engine Lane and Netherton Wood Lane	63, 67, 192, 316	HE20504 HE20611	4/639	17/P/1250/F	76.75	1,538	<ul style="list-style-type: none"> Site to the west of Engine Lane has permission for 171 homes and site area of 8.4 hectares. The site area is below lower

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<p>parameter of 10.3ha required for this proposal and regardless, development has commenced on this - permitted scheme.</p> <ul style="list-style-type: none"> The remaining land covers 68.35 hectares and has a capacity of 1,367 homes. Even individually these site areas are above the higher parameter for the proposal and will be disconnected from the settlement until the Engine Lane scheme is completed and will rely on its access. Sites are not suitable for the proposal at the time envisaged.
North West Nailsea	60, 72, 253, 318	HE20273 HE2066	4/596		17.96	450	<ul style="list-style-type: none"> Part of the site is within the Green Belt and therefore not available at this time. The remaining allocated site is too large to accommodate the proposal and is understood to be

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<p>advancing by another developer.</p> <ul style="list-style-type: none"> The site is therefore not suitable for the proposal and not available to the Applicant.
Portishead							
Old Mill Road	323, 354			18/P/3591/OUT		350	<ul style="list-style-type: none"> Site allocated for mixed use development and requires relocation of existing businesses or for incorporation into proposals. Existing businesses operating on the site. Wyndham Way placemaking study will inform redevelopment and is still ongoing. Site not available at the envisaged time for development.
Yatton							
North End, Chestnut Farm, Moor Road and Yatton Rugby Club	109, 113, 115, 118, 216, 276, 291, 334, 358	HE2012 HE20425 HE20529 HE20630	4/631 4/654	19/P/3197/FUL 22/P/0455/FUL 22/P/0456/FUL 15/P/0946/O 19/P/1884/RM		361	<ul style="list-style-type: none"> The site at Moor Lane is already being brought forward by the Applicant and cannot accommodate the proposal.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<ul style="list-style-type: none"> An application has been submitted at the Rugby Club however requires the relocation of sports facilities. The allocated site at North End has commenced development with limited outstanding capacity. The land at North End and Chestnut Farms has a limited capacity at 31 dwellings. Whilst cumulatively able to accommodate the proposal, the sites could not deliver the proposal at the envisaged time and without creating a disparate and disjointed scheme.
Rectory Farm and Biddle Street	105, 112	HE2010112 HE203		21/P/0236/OUT	19.09	414	<ul style="list-style-type: none"> Sites include the application site. Land to the south granted consent in 2022 and is being delivered by another house builder who is progressing a reserved matters proposal.

Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Assessment Summary
							<ul style="list-style-type: none"> This element of the site could not accommodate the proposal and is not available to the Applicant.
Land between Yatton and the M5	114	HE20509			217.88	4,325	<ul style="list-style-type: none"> Site area is above the higher parameter for the proposal. Access issues and potential ransom of land. Site would need to come forward as part of a strategic and phased development with comprehensive masterplanning. Site not available for the proposal at the timescales envisaged.

Table 5.1 - Schedule of Detailed Site Assessments

Yatton and the Sequential Test

- 5.19 As outlined in **Section 4**, sites across the entirety of North Somerset have been assessed against flooding and spatial constraints. Sites were discounted and the remaining sites were then assessed against a range of factors in line with the parameters discussed above relating to deliverability of the proposal at the intended time and whether they are truly 'reasonably available' to the Applicant.
- 5.20 Whilst the overarching policy position is for a District-wide assessment of sequentially preferable sites, which has been undertaken, it is also important to emphasise settlement specific requirements within North Somerset. Therefore, the need specific to Yatton should also be considered.

Context

- 5.21 Policy SP8 of the Emerging Local Plan 2038 identifies the broad distribution of dwellings in accordance with the spatial strategy. Whilst this Plan carries, at best, very limited weight at this stage, Policy SP8 provides a useful guide to how the Local Authority intend to see the distribution of housing within the District up to 2038. North Somerset identify a requirement of 20,085 homes over the plan period and propose sites for 18,046 homes across the District. Of these, 322⁸ homes are in Yatton which represents 1.78% of the distribution.
- 5.22 Yatton Rugby Club forms part of the Emerging Plan with an estimated capacity of 85 homes. As outlined in Table 5.1 and Appendix 4, the development of this site is dependent upon the replacement of the existing sports facility with an equivalent or better facility, in accordance with Paragraph 99 of the NPPF. Given the requirements of this: that a replacement facility must be sourced, secured and delivered before housing can be delivered on the Rugby Club site, there are reasonable grounds on which to contest the overall deliverability of the site for housing and should development be possible, the timescales for this are unknown and unpredictable. This site should not be relied upon as a housing allocation.
- 5.23 Elsewhere, the site at North End, which is to be carried over from the Local Plan has an extant planning permission and is currently being developed. Given the delays to the Emerging Local Plan discussed elsewhere in this report and in the Planning Statement, it is plausible to consider that this site will be delivered at the time of adoption of the Plan. It therefore could not be included as an allocation.

⁸ The Emerging Local Plan 2038 groups together Yatton and Claverham to give a total of 391 homes. The 69 homes in Claverham at Bishops Road have therefore been removed as part of this exercise.

The Need for Housing

- 5.24 North Somerset acknowledge at draft Policy SP8 that the Council's need for housing up to 2038 is 20,085 homes and they only identify land for 18,046 within the Emerging Plan. Sites in addition to those identified by the Council would need to come forward to ensure the necessary housing delivery. In the case of Yatton, to deliver 1.78% of the requirement in this plan period, an additional 36 dwellings would be needed.
- 5.25 Given the housing land supply position of 3.5 years as stated by North Somerset in recent appeals and the Annual Monitoring Report published in March 2023, there is an established need for housing in the District therefore more sites need to be identified.
- 5.26 The uncertainty about the Rugby Club site and the commencement of housing at North End show that in addition to the extra housing required to meet the plan period need, alternatives sites for housing in Yatton will be required.

The Application Site

- 5.27 The Application Site is the sequentially preferable site in Yatton to fulfil the shortfall in housing. Foul & Surface Water Drainage Strategy and Flood Risk Assessment submitted with this planning application show that the site is suitable for residential development; will be adequately flood resistant and resilient; will not place additional persons at risk of flooding; will offer a safe means of access and egress; will not increase flood risk elsewhere; will put in place measures to ensure surface water is appropriately managed; and would meet the flood risk requirements set out in the NPPF. In addition to these reports, the Plan at **Figure 5.1** shows the extent of land within and around Yatton which falls within the Environment Agency's Flood Zone 3 and even more land which is captured by the Woodspring Bay 2122 1 in 200 year Climate Change Tidal Extent. As such, to deliver much needed housing in this settlement, development will be required within these areas.
- 5.28 The development of Land at Rectory Farm (North) for the application proposal presents significant community benefits, is in a sustainable location that is a natural extension to this Service Village and can support the delivery of much needed housing on an accelerated timescale. It is therefore the sequentially preferable site for development.

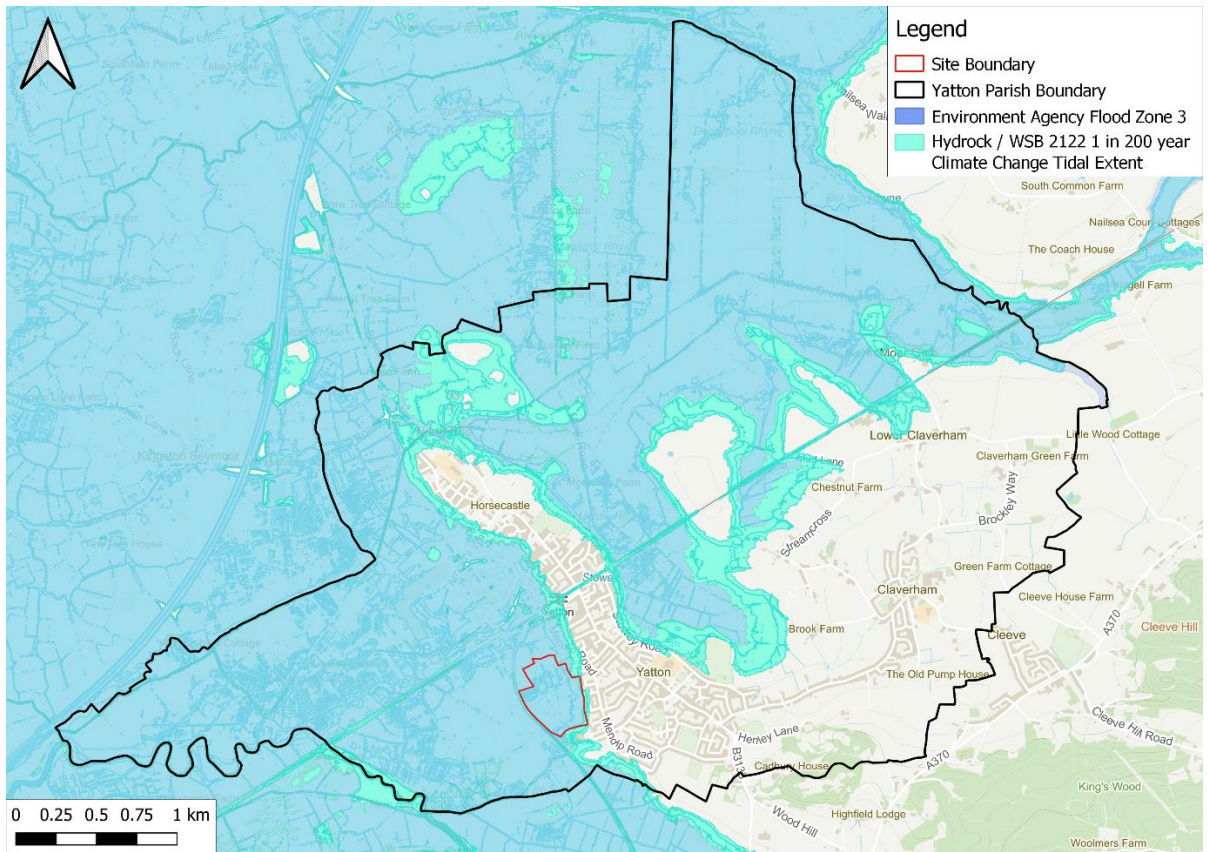


Figure 5.1 – Environment Agency Flood Zone 3 and Woodspring Bay 2122 1 in 200 year Climate Change Tidal Extent comparison plan.

6.0 THE EXCEPTION TEST

6.1 Planning Policy Guidance sets out that, notwithstanding the outcome of the Sequential Test, 'more vulnerable' developments proposed within Flood Zone 3a should be the subject of the Exception Test. For a development proposal to pass the Exception Test, it must be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

6.2 These criteria are assessed in turn below:

Criterion A: the development would provide wider sustainability benefits to the community that outweigh the flood risk

6.3 The proposed development will deliver considerable wider sustainability benefits to the community. These are assessed in detail within the Planning Statement accompanying this application and are summarised as the following:

- Provision of up to 190no. additional homes. There is an established and identified need for housing in North Somerset, which has been confirmed through appeal decisions in 2022 and the Council's latest Annual Monitoring Report. Very significant weight is therefore awarded to the quantum and range of additional housing that the proposal will provide in the District.
- Provision of up to 95 affordable homes (50%). In addition to market housing, there is an acute need for affordable housing in North Somerset and the proposal will deliver significantly more affordable housing than the policy requirement of 30%. This again has very significant weight in the planning balance.
- Additional convenience and comparison goods spend a proportion of which will be local benefiting the centre-related uses and other uses in Yatton. This will help bolster and sustain the health of high street businesses. This can be afforded significant weight.
- Temporary local employment provision. The development of up to 190 homes in Yatton will provide local employment in the construction industry on a temporary basis. Such employment provision can have multiplier effects throughout the local economy and is therefore afforded significant weight. Bolstering this, there will be ongoing employment benefits to local companies through future property maintenance and enhancement work.

- Ecological enhancements. The proposal will deliver ecological enhancements, as outlined in the Ecological Impact Assessment provided by Clarkson and Woods. The scheme can deliver 50.80% net gain in habitat units, 74.26% net gain in hedgerow units and 19.51% net gain in river units. This is given moderate weight.
- Improved connectivity and access to the Strawberry Line. The application site is located adjacent to the Strawberry Line and the proposal will provide connections to this multi-use pathway which leads directly to Yatton railway station, which offers wider two-way connectivity through to the established built area and is afforded moderate weight.
- Provision of 0.13ha of land reserved for Use Class E. This land will provide opportunities for a range of complementary uses on the Site for the use by the local community and is awarded significant weight.
- Provision of public open space. Half of the application site, the land adjacent to the Strawberry Line, will be dedicated as public open space. This has moderate weight in terms of the social arm of sustainable development as it will open up land for the use and enjoyment of the existing and future community of Yatton.
- New and readily and suitably accessible allotments of a scale that is policy compliant. This is of significant weight
- Public Transport. The proposal will support public transport use and spend through ease of accessibility to sustainable transport modes such as the nearby train station and bus routes. This has moderate weight in the balance.

6.4 The above criteria show that the proposal will deliver considerable sustainability benefits to the existing community of Yatton and future residents of the Site and these benefits justifiably outweigh the flood risks. As such, Criterion A of the Exception Test is satisfied.

Criterion B: The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

6.5 The Flood Risk Assessment and Hydraulic Modelling Report submitted with application sets out how the development satisfies Criterion B of the Exception Test. It details measures recommended to mitigate any 'residual' flood risks, to ensure that the proposed development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere. A summary of these measures follows:

6.6 Level Raising: The development is to be located in the areas of site with the predicted shallowest flood depths in the present-day scenario in the eastern portions. However, for the developments design life (100 years) the inclusion of climate change to the Woodspring Bay 2020 model indicates the entirety of site to be inundated with a maximum flood level

of 7.88m AOD in 2122 0.5% AEP (1 in 200-year) plus Higher Central climate change tidal event. In accordance with local and national policy, and through a combination of ground raising and setting of finished floor levels (FFLs) all proposed dwellings are recommended to be set to include a 600mm freeboard above the 1 in 200-year plus climate change event. This means the FFLs should be set to a minimum level of 8.48m AOD.

6.7 **Safe Access and Egress:** The site layout plan shows there are two proposed access and egress routes for the proposed development, one in the north leading onto the existing Shiners Elms and another in the south leading onto the existing Chescombe Road. Existing Flood Zone mapping shows the northern site entrance to be within present day Flood Zone 2 and 3 and this is further confirmed from outputs of the Woodspring Bay 2020 model. However, the southern access point onto Chescombe Road is shown to be within Flood Zone 1 and therefore predicted lowest risk of fluvial and tidal flooding in the present day and as such would be a safe access and egress route in the event of a flood event. With the impact of climate change however, the 1 in 200 year plus Higher Central allowance shows the access point onto Chescombe Road would be pushed into Flood Zone 3a, although at the very limit of flooding where flood waters are predicted to be much shallower than those experienced on site with maximum depths up to 1m on the access road (**Figure 6.1**).

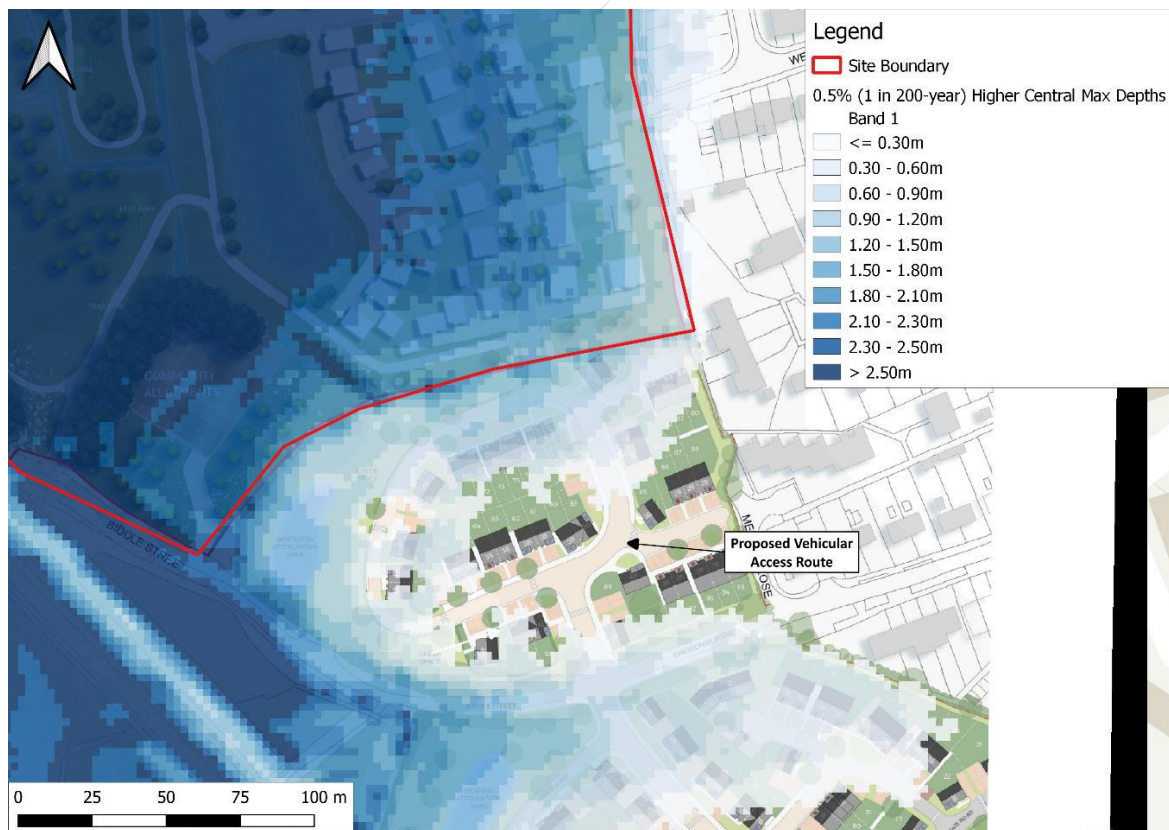


Figure 6.1: Maximum flood depths for the southern vehicular access route - 0.5% (1 in 200-year) Higher Central Event (this figure does not include proposed ground raising and hence flooding interacting with plots)

6.8 Modelling outputs have also identified areas of lowest hazard in accordance with Defra 'Framework and Guidance for Assessing and Managing Flood Risk for New Development' (FD2320/TR2). This guidance assesses the threshold for flood hazard ratings and classifies them as:

- *Low (Hazard) - Caution - "Flood zone with shallow flowing water or deep standing water"*
- *Moderate (Hazard) - Dangerous for some (i.e. children) - "Danger: Flood zone with deep or fast flowing water"*
- *Significant (Hazard) - Dangerous for most people - "Danger: flood zone with deep fast flowing water"*
- *Extreme (Hazard) - Dangerous for all - "Extreme danger: flood zone with deep fast flowing water"*

6.9 The results of the modelling **Figure 6.2** show the site to be classified as an Extreme degree of flood hazard however the southern vehicular access is shown to pass through areas identified as lower hazard ratings, with part of it shown to be outside of the flooding extent entirely.

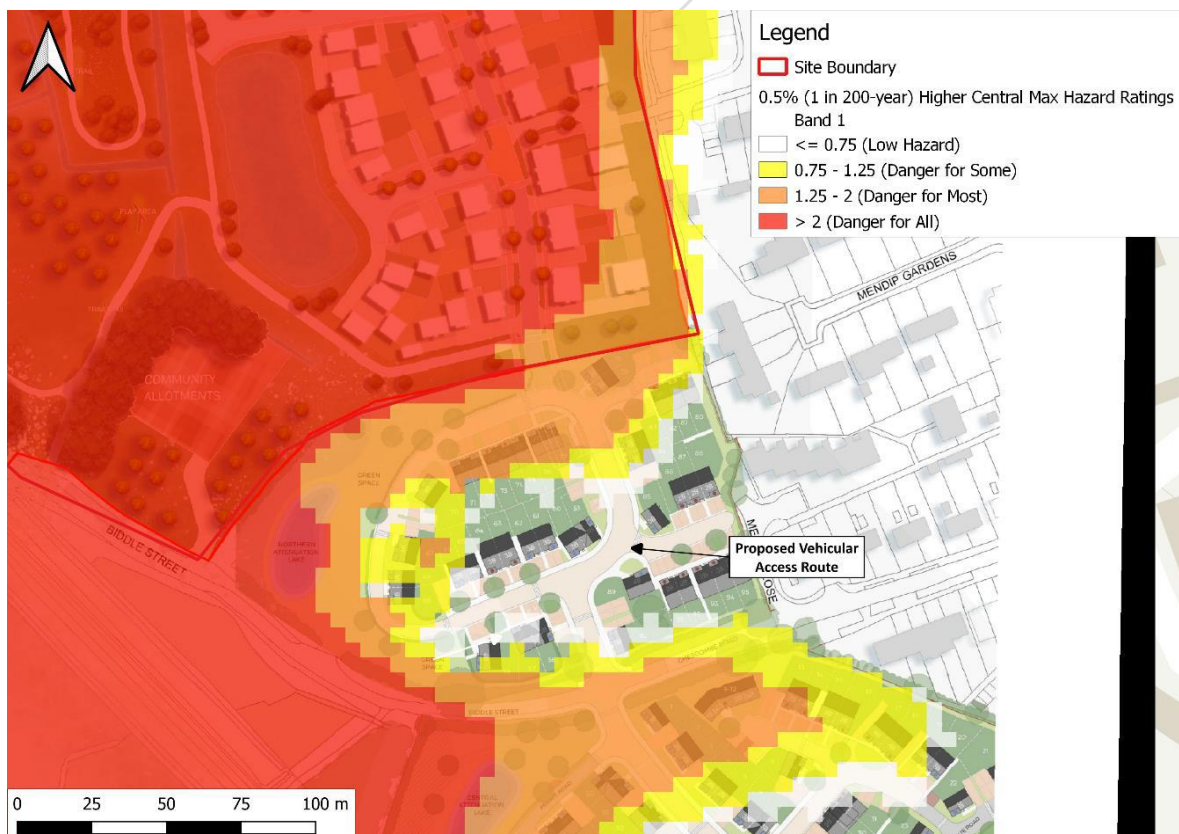


Figure 6.2: Maximum hazard ratings for the southern vehicular access route - 0.5% (1 in 200-year) Higher Central Event (this figure does not include proposed ground raising and hence flooding interacting with plots)

- 6.10 Therefore, to address safe access and egress onto the site, it is recommended that this be addressed through a Flood Warning and Evacuation Plan (FWEP). The proposed FWEP should make residents and visitors aware of the potential risks to site and what to do should an extreme tidal flood occur, showing access and egress routes off the site. The recommended mitigation also ensures that in the event residents cannot leave the site during a flood event, there will be an area for safe refuge in the properties where residents can remain until flood waters recede.
- 6.11 It should be noted that whilst sections of the site and access are shown as being at increase hazards this is at the very peak of the modelling tidal event and the above figures do not show the reaction to the event. Given the dominant source is tidal this is a very predicted mechanism of flooding with high tides being predicted a long way into the future (i.e. weeks) so as to ensure suitable warnings and measures can be implemented (i.e. evacuation etc). Further to this the modelling has been used to determine the length of time from first out of bank flooding occurring to this impacting the site. The modelling (and as shown in **Figure 6.3** below) shows that flooding first occurs within the site **15 hours** after the first out of bank flows occur north of the M5 Motorway / Mouth of the Congresbury Yeo and some 4.5km north west of the site. Water levels on the site then continue to increase throughout the site with maximum flood levels and hazards as shown **on Figure 6.4**. Given the minimum lead in time of 15hours on a predictable event it is considered that through preparation of a Flood Warning and Evacuation Plan suitable measures will have time to be implemented such that access and egress can be achieved safely through the site.

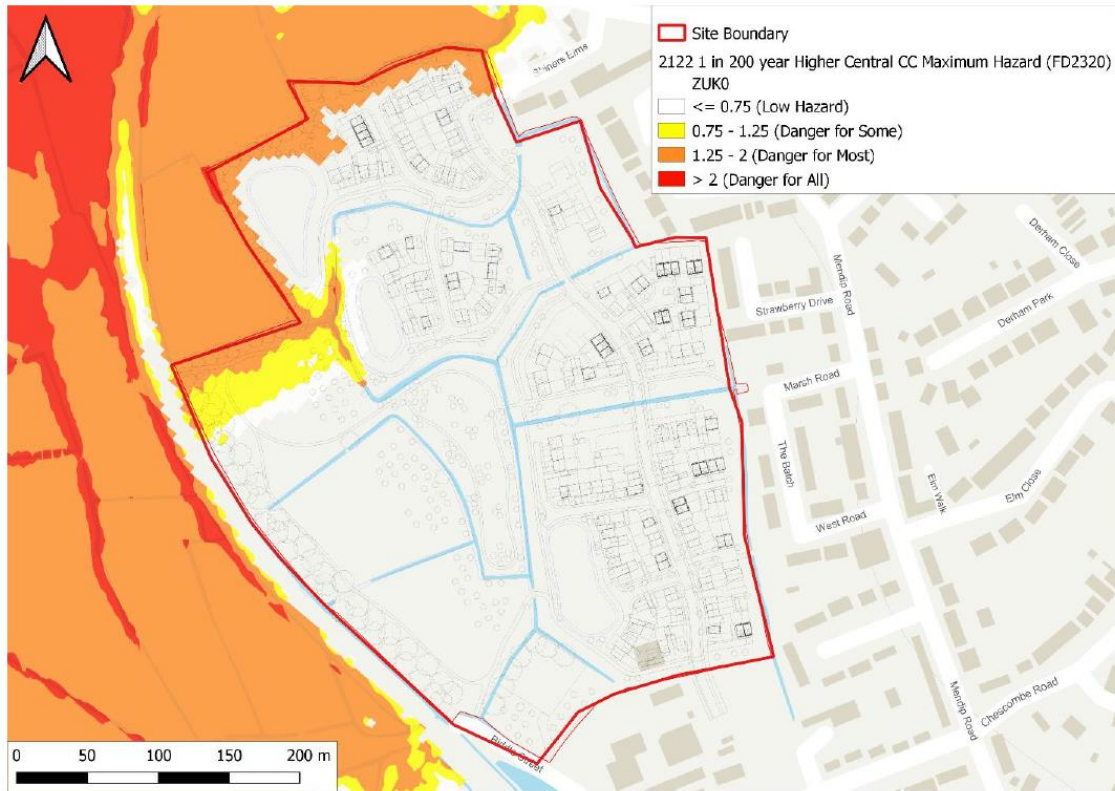


Figure 6.3: Hazard Mapping for the 2122 0.5% (1 in 200-year) AEP Higher Central Tidal Event - Initial onsite flooding

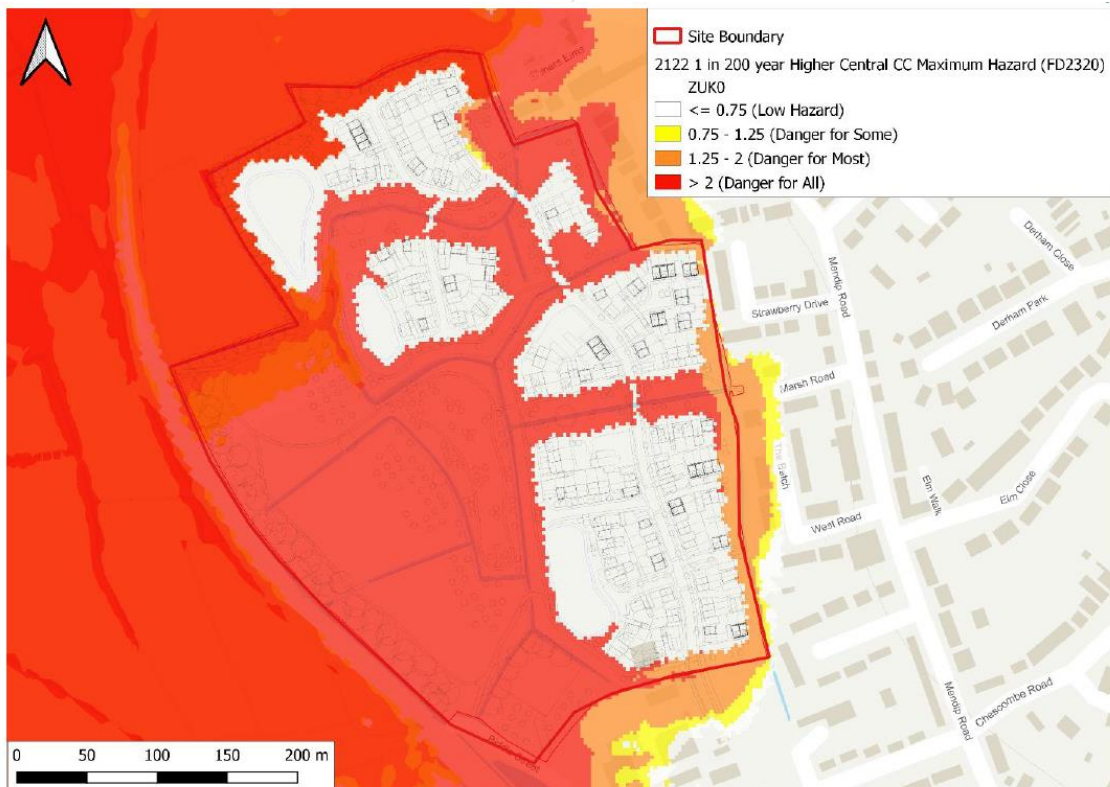


Figure 6.4: Maximum Hazard Mapping for the 2122 0.5% (1 in 200-year) AEP Higher Central Tidal Event.

- 6.12 **Floodplain Storage and Cumulative Impacts:** The Flood Risk Assessment and Hydraulic Modelling Report confirms the dominant source of flood risk to the site is from tidal sources in the undefended scenario. Tidal extents are often much larger than fluvial flood events and as a result do not require compensation storage as a result of proposed development. Paragraph 049 of the PPG states: "*The loss of floodplain storage is less likely to be a concern in areas benefitting from appropriate flood risk management infrastructure or where the source of flood risk is solely tidal.*" Therefore, no compensatory storage is required for the tidal flooding as discussed and agreed with the LLFA.
- 6.13 With regards to surface water compensatory storage, the EA Surface Water Flood Risk Map (**Figure 6.5**) identifies all areas of 'High' risk classified as "*each year, the area has a chance of flooding of greater than 1 in 30 (3.3%)*" and 'Medium' risk classified as "*each year, the area has a chance of flooding of between 1 in 100 (1%) and 1 in 20 (3.3%)*" to be located in the rhynes and are not predicted to extend out into the floodplains. As development will be restricted to the land parcels, there will be no loss of floodplain storage for these areas of risk and as such no compensatory storage is required for surface water.

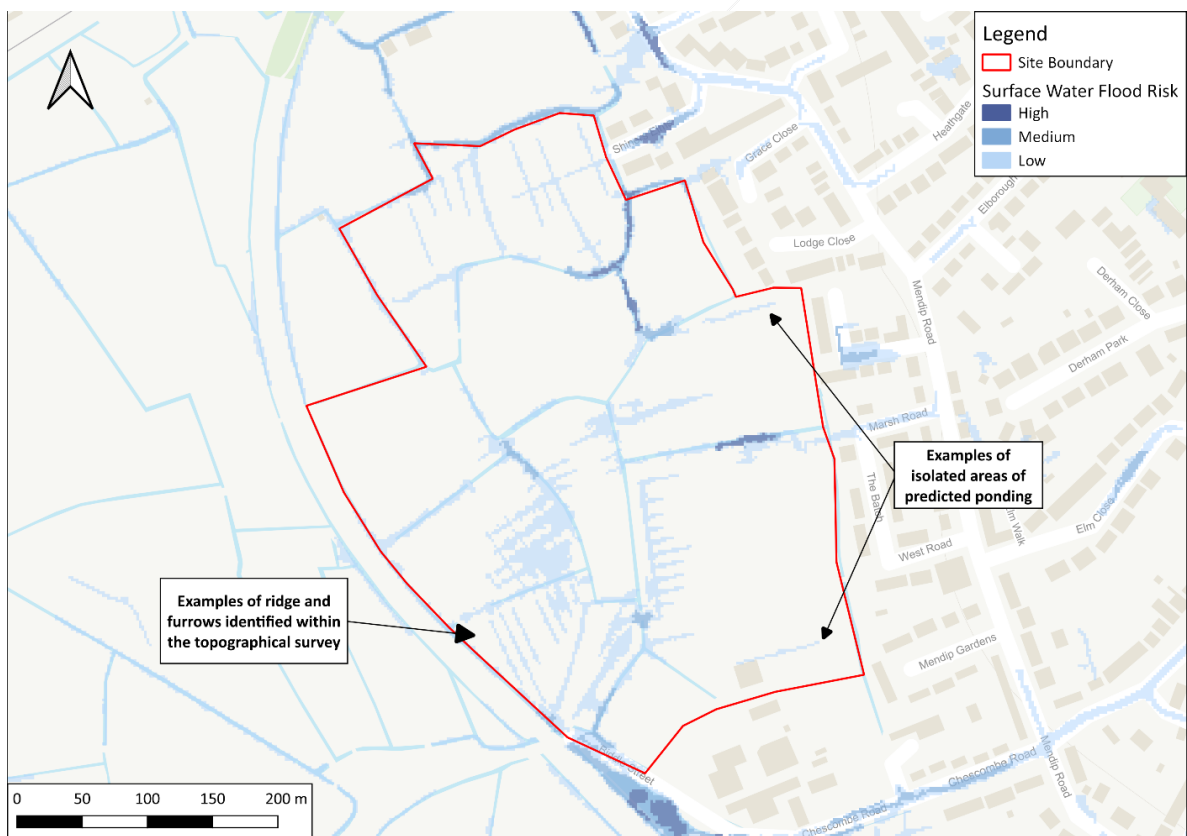


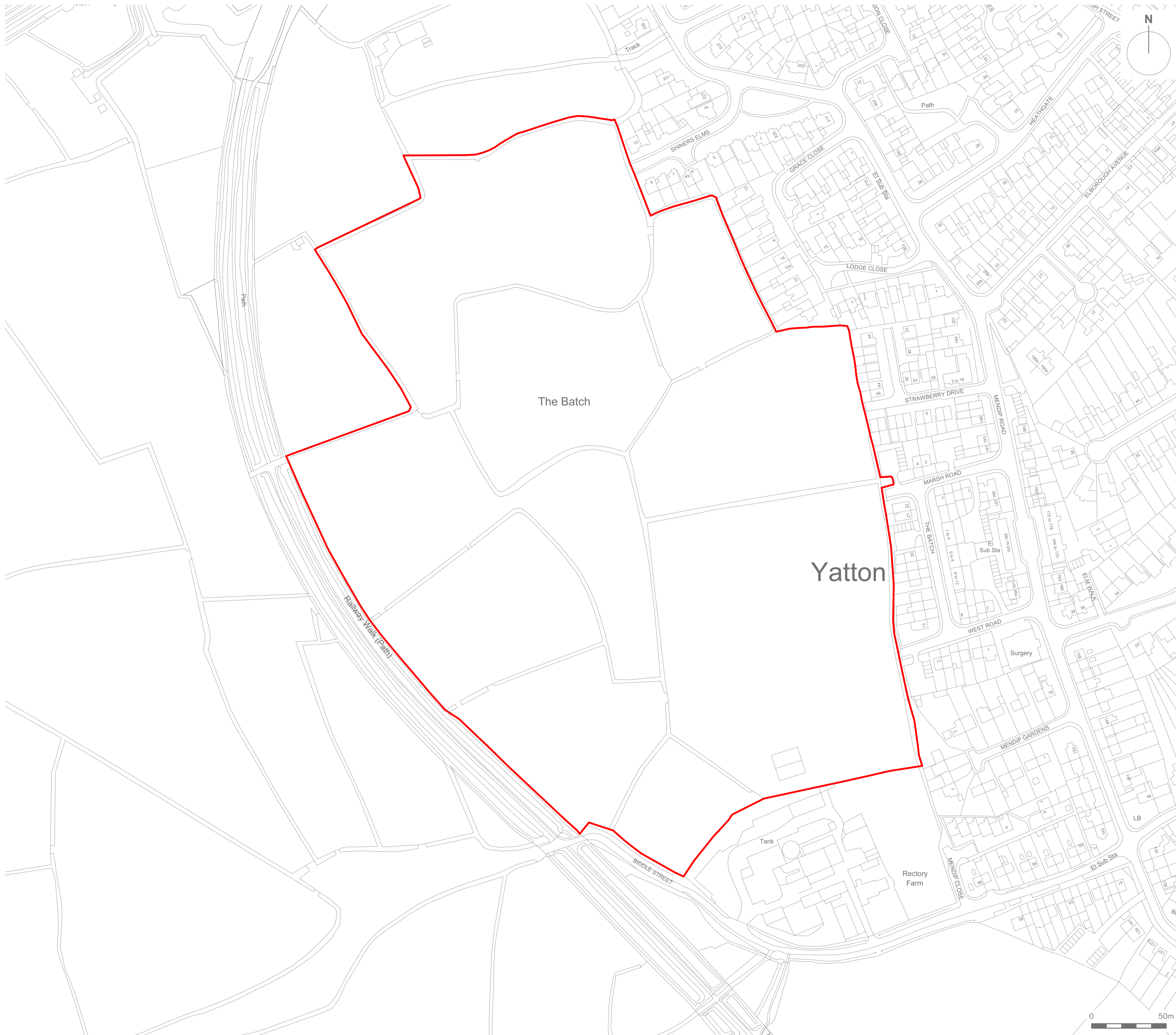
Figure 6.5: Site Boundary with the EA Surface Water Flood Risk Extents

- 6.14 The Flood Risk Assessment and Hydraulic Modelling Report should therefore be read in conjunction with this Exception Test, which shows that Criterion B has been satisfied.

7.0 CONCLUSIONS

- 7.1 This Flood Risk Sequential Test and Exception Test has been prepared by Barton Willmore, now Stantec on behalf of Persimmon Homes Severn Valley (the 'Applicant') in support of an outline planning application for the proposed development of Land at Rectory Farm (North), Chescombe Road, Yatton (the 'Site').
- 7.2 This Sequential Test has been prepared in line with national and local policy and guidance. The purpose of this report is to address policy requirements in respect of the suitability of the Site for the proposed development in terms of flood risk, having due regard to reasonably alternative sites within North Somerset.
- 7.3 The methodology in this Report demonstrates that the Site is one of the most sequentially preferable sites for residential development and that it is the most sequentially preferable site for the proposal of 190 homes with 50% affordable housing, land for Use Class E and other benefits including extensive public open space, allotments and biodiversity benefits in North Somerset, at the time intended for development. The proposal also complies with both limbs of the Exception Test. In being sequentially preferable it can help fill the 'headroom' between North Somerset Council's supply of housing and its requirement.
- 7.4 The proposal will deliver a high quality residential development in a sustainable location with significant community benefits, including 50% affordable housing, public open space, allotments, land for Use Class E, improved connectivity and a biodiversity net gain.

APPENDIX 1
SITE LOCATION PLAN



 Site Boundary (13.79ha)

client
Persimmon Homes Severn Valley

project title
**Land at Rectory Farm (North),
 Yatton, North Somerset**

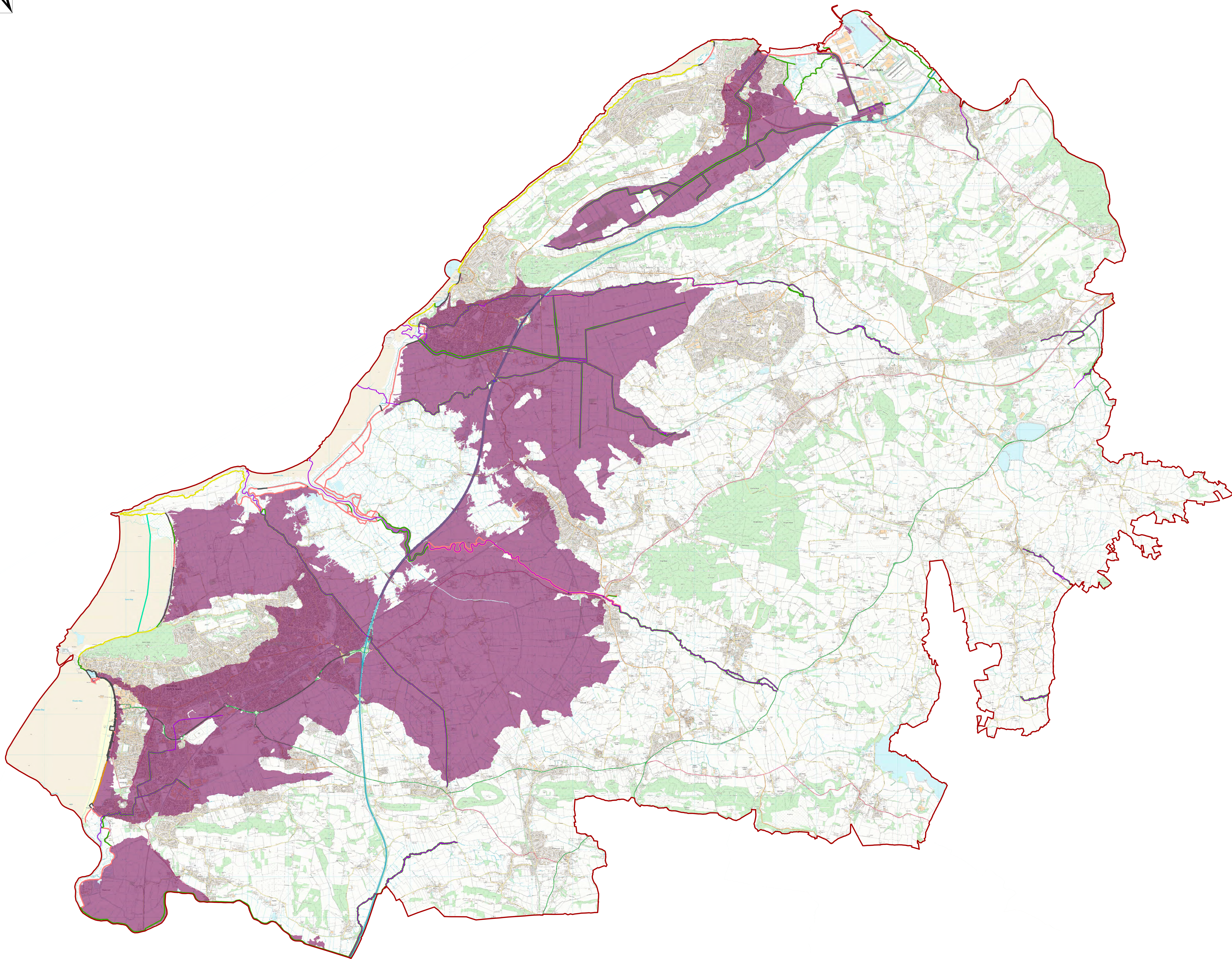
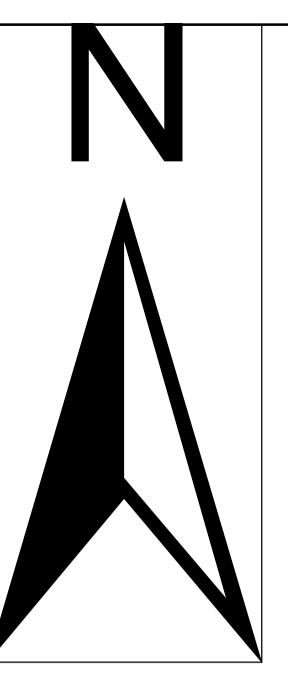
drawing title
Red Line Plan

date	21 MARCH 2023	drawn by	PDa
drawing number	edp7842_d021	checked	GHo
scale	1:1,250 @ A1	QA	OSh



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APPENDIX 2
FLOOD DEFENCES IN NORTH SOMERSET



Key

- NSC boundary
- Main Rivers
- EA Areas Benefiting from Defences

Defence Asset Type

- Beach
- Bridge Abutment
- Cliff
- Dunes
- Embankment
- Flood Gate
- High Ground
- Wall

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Project: North Somerset Council
Level 1 Strategic Flood Risk Assessment

Title: Defence Types and
Areas Benefiting from Defences

FIGURE 040

Figure Reference: 67946CH-L1-SFRA-FIG-040

Scale: Not to scale Date: 16/12/2019

Originated by: MK Checked by: MA Reviewed by: MS Approved by: GD

APPENDIX 3
SCHEDULE OF SITES DISCOUNTED THROUGH THE FIRST STAGE

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
	Backwell							
1.	Backwell Hill Road / Land south of Uncombe Close	44, 51 and 74	HE2010, HE2011 and HE209			2.37	77	These sites have been considered cumulatively to create a larger site area, however the area is still below the minimal threshold and is too small to accommodate the proposal. Each of the sites also fall within the Green Belt.
2.	Wooleys Farm	47	HE201061			3	100	The is below the minimal threshold and is therefore too small to accommodate the proposal. The site also falls within the Green Belt.
3.	Hilldale Road and Dark Lane	48 and 70	HE201068 and HE20633			8.15	244	These sites have been considered together given their location. Whilst they are expected to be able to accommodate an estimated 244 dwellings, both sites fall within the Green Belt and are therefore not immediately available to the Applicant.
4.	Land east of Backwell and Land at Flax Bourton	54, 69 and 357	HE202012 and HE2062			117.46	2,300	These sites cover a large area of Backwell and adjacent Nailsea and 500 homes proposed as a draft allocation in the Local Plan 2038. The total capacity of an estimated

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
								2,300 dwellings covers a large land area whereby development would have to come forward strategically over a period of time. The entire land area in this location falls within the Green Belt.
5.	Land south east of Church Lane and St Andrew's Church	56 and 57	HE20213 and HE20214			5.82	175	These sites have been considered together given their location on opposite sides of Uncombe Close. They have an estimated cumulative capacity of 175 dwellings however both sites fall within the Green Belt and are therefore not immediately available to the Applicant.
6.	South of Kellways, West Town	64	HE2058			0.82	30	This site is adjacent to the larger site assessed in the FRST at Grove Farm however it is separated by the A370 and falls within the Green Belt. Therefore it has not been considered with the larger group of sites.
7.	Moor Lane Backwell	209 and 329		4/600	15/P/1916/O 18/P/2169/RM		85	The consented development has been completed.
	Banwell, Bleadon, Hutton, Locking, Uphill and Weston-super-Mare							

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
8.	Leighton Crescent/ Land south of Bleadon Hill	79, 89	HE201030, HE2035			4.63	120	These sites have been considered together however even combined, they could not accommodate the proposal.
9.	Land south of Elborough	81	HE201040			22.86	560	This site lies almost wholly within the Mendip Hills AONB and are therefore not immediately available for development by the Applicant.
10.	North of Locking	82	HE201067			2.89	37	This site is too small to accommodate the proposal and is not immediately adjacent to other appropriate available land.
11.	Manor Farm, South of Oldmixon Road	84	HE20128			5.63	16	Whilst the theoretical capacity of this site could accommodate the proposal, the site area is below the required size. The site is also wholly located in the Mendip Hills AONB.
12.	Land north of Ebdon Road/ Oak Farm, Ebdon	85, 99	HE202007 HE20626			1.14	26	These sites are too small to accommodate the proposal and are isolated from other available land.
13.	Land adjacent to Homefield Industrial Estate	91	HE2037			0.77	27	This site is too small to accommodate the proposal and is not immediately adjacent to other appropriate available land.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
14.	Hutton Garden Centre, Banwell Road	93	HE2046			2.68	80	The site lies wholly within the AONB, it cannot accommodate the proposal and is disconnected from existing settlements.
15.	St George's Triangle	98	HE20624			2.16	54	This site is too small to accommodate the proposal and is not immediately adjacent to other appropriate available land. Nearby sites are separated by a railway line and motorway which the proposal could not be spread across.
16.	Land at Old School House, The Green, Locking	102	HE2079			0.02	1	This site is too small to accommodate the proposal and is not adjacent to other available land.
17.	Grange Farm, Hutton/ Land west of Hutton	104, 334	HE202017			4.4	100	This site has a draft allocation in the emerging plan however is too small to accommodate the proposal.
18.	Land to north of Purn Way	128	HE2024			0.82	14	This site has a draft allocation in the emerging plan however is too small to accommodate the proposal and is not adjacent to other available land.
19.	West of Willow Drive	129	HE20357			0.86	31	This site is too small to accommodate the proposal and is not adjacent to other available land.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
20.	North of Amesbury Drive	130	HE2051			2.18	65	This site is too small to accommodate the proposal and is not adjacent to other available land.
21.	Purn House Farm industrial estate	131	HE2083			2.4	60	This site is too small to accommodate the proposal and is not adjacent to other available land.
22.	Land adj Plum Tree Farm, off Summer Lane	195		4/440	98/2557 08/P/0626/RM		8	This site is too small to accommodate the proposal and is not adjacent to other available land.
23.	Atlantic Road South/Land at Atlantic Road South	196, 294		4/087	14/P/1210/LDE 19/P/2933/MMA		23	This allocated site is too small to accommodate the proposal, a lawful development certificate has been issued to confirm that development is extant and is not adjacent to any other available land.
24.	Land at Scot Elm Drive/ Westacres Caravan Park/ Scot Elm Drive	197, 202, 297		4/616, 4/362a	20/P/0792/FUL 19/P/0413/FUL		202	These allocated sites had an estimated total estimated capacity of 202 dwellings. Planning permissions have been granted on both sites which have been implemented. As such, the sites are not available to the Applicant for the proposal and do not have sufficient capacity outstanding.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
25.	Former TJ Hughes store, 17 High Street, Weston-super- Mare	198		4/649	17/P/1832/F		19	This allocated site is too small to accommodate the proposal and is and isolated from other available land.
26.	Land at Wilson Gardens / Scot Elm Drive	199, 308		4/675	17/P/0752/F		51	This allocated site is too small to accommodate the proposal and development has already commenced on the consented scheme.
27.	Dauncey's Hotel/ Lynton House Hotel/ Birnbeck Pier and Environs/ Royal Pier Hotel/ Dauncey's Hotel, Clarent Crescent	200, 205, 259, 299, 306	HE20714	4/672, 4/562, 4/619,	11/P/0006/F 18/P/4932/FUL 18/P/4990/FUL 18/P/4934/FUL 18/P/4936/FUL 19/P/2018/FUL		191	These sites are covered by four different allocations, some of which are overlapping. Whilst the total estimated capacity is 191 dwellings, the Birnbeck Pier allocation is for a mixed use scheme; the physical size of the sites are not great enough to deliver the proposal and its benefits; and the site is not of the same in nature as the application Site, which is required for the proposal.
28.	69-71 Locking Road	201		4/688	18/P/4822/FUL		11	This site with a draft allocation is too small to accommodate the proposal and is isolated from other available land.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
29.	Madeira Cove Hotel, Birnbeck Road	204		4/697	18/P/3335/FUL		10	This site with a draft allocation is too small to accommodate the proposal and is isolated from other available land.
30.	38-40 Birnbeck Road	206		4/704	19/P/3151/FUL		26	This site with a draft allocation is too small to accommodate the proposal. Development on the consented scheme has commenced and the site is isolated from other available land.
31.	Land adjacent to Diamond Batch, Summer Lane	207		4/706	20/P/1059/FUL		20	This site with a draft allocation is too small to accommodate the proposal and is isolated from other available land.
32.	Land at Bridgwater Road	233		4/646	17/P/1138/O 22/P/0492/RM		60	This allocated site is too small to accommodate the proposal and there is no adjacent available land.
33.	Bridge Farm, Bristol Road/ Land to the north of the A370, Summer Lane	256, 303		4/520	10/P/1339/F		140	These allocated sites are separated by a railway line. They have a total estimated capacity of 140 and therefore cannot accommodate the proposal. The separation by a railway line would not be suitable for this proposal. The approved scheme at Summer Lane has been implemented meaning its capacity has been reduced further and is

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
								therefore not available to the Applicant.
34.	Land to the rear of Locking Road	260		4/592			24	This allocated site is too small to accommodate the proposal and is and isolated from other available land.
35.	Mead Vale Shopping Centre, Nightingale Close, Worle	262	HE20709	4/602	20/P/2446/OUT		34	This allocated site is too small to accommodate the proposal and is and isolated from other available land.
36.	Former Bournville School site, Selworthy Road	265	HE20711	4/647			45	This allocated site is too small to accommodate the proposal and is and isolated from other available land.
37.	Former Sweat FA site, Winterstoke Road	266	HE20564	4/648			45	This allocated site is too small to accommodate the proposal and is and isolated from other available land.
38.	Walliscote Place (Police Station and Magistrates Court)	267	HE20712	4/611			70	This allocated site is spread across three sites which are separated by roads. The disconnected sites would not be appropriate for the development, could not accommodate the quantum of the proposal and are not immediately adjacent to other available land.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
39.	Former Weston Library and adjacent BT Building, Boulevard	268, 301	HE20713				70	This allocated site is too small to accommodate the proposal and is and isolated from other available land.
40.	Queensway/ Midhaven Rise	270	HE20715	4/674			35	This allocated site is too small to accommodate the proposal and is and isolated from other available land.
41.	Jackson Barstow House, 28 Thornbury Road, Uphill	281		4/608			20	This allocated site is too small to accommodate the proposal and is and isolated from other available land.
42.	Land At Warleys Lane	283			21/P/1337/FUL		9	This site with an extant planning permission is too small to accommodate the proposal and is not adjacent to other available land.
43.	57 Beach Road (Somerset Legion House)	285			21/P/1002/FUL		42	This site with an extant planning permission is too small to accommodate the proposal and is not adjacent to other available land.
44.	Land at Milton Hill	295			08/P/0570/RM		12	The planning permission at this allocated site has been completed. It is therefore not available for development by the applicant. It is also too small to have

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
								accommodated the proposal and not adjacent to other available land.
45.	Brimbleworth Farm St Georges	296			11/P/2214/F		14	The planning permission at this allocated site has been completed. It is therefore not available for development by the applicant. It is also too small to have accommodated the proposal and not adjacent to other available land.
46.	Land at Wellsea Grove	298			14/P/0156/F		34	The planning permission at this allocated site has been completed. It is therefore not available for development by the applicant. It is also too small to have accommodated the proposal and not adjacent to other available land.
47.	The Bayside Hotel	300			14/P/1791/F		15	The planning permission at this allocated site has commenced. It is therefore not available for development by the applicant. It is also too small to have accommodated the proposal and not adjacent to other available land.
48.	Lawrence Court, Lawrence Road	302			15/P/1616/F		14	The planning permission at this allocated site has been implemented. It is therefore not available for development by the

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
								applicant. It is also too small to have accommodated the proposal and not adjacent to other available land.
49.	Land at Wentwood Drive	305			15/P/0983/O		50	The planning permission at this allocated site has been implemented. It is therefore not available for development by the applicant. It is also too small to have accommodated the proposal and not adjacent to other available land.
50.	26 Bristol Road Lower	307			18/P/2922/FUL		16	This allocated site is too small to accommodate the proposal and is and isolated from other available land.
51.	Land to the east of Wolvershill Road	336			16/P/2094/O		44	The planning permission at this allocated site has been completed. It is therefore not available for development by the applicant. It is also too small to have accommodated the proposal.
52.	Knightstone Road Hotels	350	HE201009				40	This site with a draft allocation is too small to accommodate the proposal and is not adjacent to other available land.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
53.	Former Police Depot, Winterstoke Road	351					36	This site with a draft allocation is too small to accommodate the proposal and is not adjacent to other available land.
	Churchill, Sandford, Winscombe							
54.	Hilliers Lane	133	HE201035			2.31	35	This site is too small to accommodate the proposals and not adjacent to other available sites.
55.	Off Churchill Green	135	HE201093			4.38	131	This site is too small to accommodate the proposals and not adjacent to other available sites.
56.	Land to west of Wyndhurst Farm	139	HE20590			3.54	106	This site is too small to accommodate the proposals and disconnected from other sites by highways infrastructure.
57.	West of Ladymead Lane	140	HE20608			3.84	103	This site is too small to accommodate the proposals, is not adjacent to other available sites and is not well-connected to the main settlement.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
58.	Skinners Lane	142	HE2089			2.23	66	This site is too small to accommodate the proposals and not adjacent to other available sites.
59.	Land south of Bristol Road	214		4/681	18/P/4241/RM		38	This site is too small to accommodate the proposal and the approved scheme has been implemented.
60.	Says Lane	333			15/P/1313/O		43	This allocated site is too small to accommodate the proposal and the consented scheme has been implemented.
61.	Blagdon Water Garden Centre	227		4/708	19/P/1963/FUL		11	This site is too small to accommodate the proposals and not adjacent to other available sites.
62.	Land west of Sandford/ Land at Mead Lane/ Land at Mead Farm	167, 172, 176	HE201012, HE2034, HE2075			5.18	78	These sites have been considered together and are still too small to accommodate the proposal and are not located adjacent to any other available land.
63.	Land off Hill Road/ South of Sherwood/ South of Roman Road	168, 170, 171	HE201015, HE20252, HE20253			6.24	191	Whilst these sites have an estimated capacity within the parameters, the site area is significantly lower than required to deliver the benefits of the proposal

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
								and the sites are not adjacent to other available land.
64.	Land north of Greenhill Road/South of Greenhill Road	169, 175	HE201022, HE20617			5.27	11	These sites have been considered together and are still too small to accommodate the proposal and are not located adjacent to any other available land.
65.	Greenhill Lane	173	HE20344			2.73	85	This site is too small to accommodate the proposals and not adjacent to other available sites.
66.	Land to the north of the A368, Sandford	223, 338		4/653	15/P/0583/O 17/P/1799/RM		118	This allocated site is too small to accommodate the proposal and the consented scheme has been implemented.
67.	F Sweeting and Son site, Station Road, Sandford	239		4/682	18/P/2024/OUT		16	This allocated site is too small to accommodate the proposal and the consented scheme has been implemented.
68.	South of Fullers Lane / Fullers Lane near Winscombe	177 178	HE20120 HE20121			3.2	102	These sites have been considered together and are still too small to accommodate the proposal and are not located adjacent to any other available land.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
69.	Sandford Batch (Broadleaze Farm)	179, 273	HE20187	4/679		3.17	75	This allocated site is too small to accommodate the proposals and not adjacent to other available sites.
70.	East of Well Close	180	HE20333			2.76	82	This site is too small to accommodate the proposals and not adjacent to other available sites.
71.	Land east of Winscombe / Land at Shipham Lane	181, 271	HE20716	4/677		0.81	29	This allocated site is too small to accommodate the proposals and not adjacent to other available sites.
72.	Land south of Coombe Farm / Land adjoining Coombe Farm	182, 272	HE20717	4/678		3.3	99	This allocated site is too small to accommodate the proposals and not adjacent to other available sites.
73.	West of Hill Road/ Hill Road	183, 184	HE2076 , HE2077			3.43	110	These sites have been considered together and are still too small to accommodate the proposal and are not located adjacent to any other available land.
74.	Winscombe Community Centre	185	HE2078			0.9	32	This site is too small to accommodate the proposals and not adjacent to other available sites.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
75.	Woodborough Farm	211, 212, 213, 327		4/590a, 4/590b, 4/590c,	15/P/1979/O 18/P/3214/RM 19/P/1866/RM 19/P/3045/RM		175	Development has commenced on this allocated site and the residual capacity could not accommodate the proposal.
76.	The Chestnuts, south of Sidcot Lane	326			16/P/1607/F		24	This site is too small to accommodate the proposal and the consented scheme has been delivered.
77.	Former Mooseheart Lodge (Kildare House) 70 Woodborough Road	292			18/P/5196/FUL		18	This site is too small to accommodate the proposal and not adjacent to other available land.
	Claverham							
78.	Former UTAS Site, Claverham Village Hall, Bishops Road, Claverham	119 and 224	HE2073 and HE20489	4/683	18/P/3659/FUL	5.57	167	The southern part of the site had consent granted for 77 dwellings and development has commenced. The remaining land to the north would have an estimated capacity of 90 dwellings which would be too small to accommodate the proposal and is not adjacent to any other available land that it could be adjoined with.
	Clevedon							

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
79.	Land off Castle Road	2	HE202004			10.06	201	This site could have a suitable capacity to accommodate the proposal, however it lies within the Green Belt and is therefore not immediately available for development.
80.	North of Nortons Wood Lane	4	HE20328			3.46	103	This site is too small to accommodate the proposal, is anticipated in the SHLAA to come forward in more than 5 years' time and lies within the Green Belt.
81.	North of and East of Brookfield Walk	6 and 7	HE20581 and HE20582			11.26	337	These sites have been assessed together and lie within the required size parameters of the proposal, however both sites lie within the Green Belt and are therefore not immediately available for development.
82.	2-6 Bay Road, Clevedon	190		4/666	17/P/1078/F		19	This site has consent for 19no. flats and development has commenced. The site is too small to accommodate the proposal, not adjacent to other available land and an existing permission is being built.
83.	Land at 173-175 Kenn Road	191	HE2019	4/698	18/P/4846/FUL		54	This site has consent for a retirement living plus extra care development of 54 units which has

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
								commenced. The site is therefore too small to accommodate the proposal, not adjacent to other available land and an existing permission is being built.
84.	Moor Lane, Clevedon	248		4/526			10	This site is allocated for 10 dwellings and is not adjacent to other available sites. It is therefore too small to accommodate the proposal.
85.	Millcross site, Clevedon	249	HE2026	4/605			67	This site is allocated for 67 dwellings and is not adjacent to other available sites. It is therefore too small to accommodate the proposal.
86.	Land north of Churchill Avenue (AKA Wordsworth Road)	250	HE20701	4/637			44	This allocated site is too small to accommodate the proposals and not adjacent to other available sites.
87.	Yeolands Farm (AKA Land at Coxway)	251	HE20702	4/638			15	This allocated site is too small to accommodate the proposals and not adjacent to other available sites.
88.	Clevedon Hall Estate	309			12/P/1539/F 15/P/2135/F		39	The site is too small to accommodate the proposal, not

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
								adjacent to other available land and an existing permission is built.
89.	Marine Hill House, Marine Hill	310			11/P/2183/F		9	The site is too small to accommodate the proposal, it is not adjacent to other available land and an existing permission is built.
90.	Waverley House	311					21	This allocated site is too small to accommodate the proposals and not adjacent to other available sites.
91.	Court Farm, All Saints Lane	312		4/667	17/P/2435/O 19/P/1719/RM		10	The site is too small to accommodate the proposal, not adjacent to other available land and an existing permission is built.
92.	Great Western Road	352					39	This site with a draft allocation in the Emerging Local Plan is too small to accommodate the proposals and not adjacent to other available sites.
	Congresbury							
93.	Vicarage and car park to church	145	HE20106			1.44	51	This site is too small to accommodate the proposals and not adjacent to other available sites.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
94.	North of Wrington Mead and Wrington Road	146 and 161	HE201077 and HE2042			3.1	104	These sites have been assessed together however cumulatively are still too small to accommodate the proposal, they are not immediately adjacent to other available land and lie within the Green Belt.
95.	North West of A370 Congresbury bridge	157	HE20308			1.38	25	This site is too small to accommodate the proposals and not adjacent to other available sites.
96.	Land East of Smallway/ Adjacent to Hope Cottage	158, 217, 289	HE20309	4/693		0.64	25	This allocated site is too small to accommodate the proposals, is expected to come forward in more than 5 years' time and is not adjacent to other available sites.
97.	Land south of Cadbury Garden Centre	210		4/676	16/P/2982/O 18/P/3367/RM		21	This site has consent for 21 dwellings and is therefore too small for the proposal and the permission is built.
98.	Leonard Elms, Brinsea Road	222		4/686	18/P/3461/FUL		11	This site has consent for 11no. extra care apartments. The site forms part of an existing extra care development and is too small to accommodate the proposal.
99.	Land south of Station Road (A370)	237		4/690	18/P/2532/OUT 22/P/1818/RM		13	This site with a draft allocation in the Emerging Local Plan is too small

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
	adjoining Station Close							to accommodate the proposal and not adjacent to other available sites.
100.	Land south of Station Road Adjoining Church Farm	278		4/691			20	This site is too small to accommodate the proposals and is not adjacent to other available sites.
101.	Land to the north of Bristol Road (A370) opposite Tesco express store	279 and 363		4/692			25	This site is too small to accommodate the proposals and is not adjacent to other available sites.
102.	The Causeway, corner of Dolemoor Lane,	280		4/694			10	This site is too small to accommodate the proposals and is not adjacent to other available sites.
103.	Venus Street	331			16/P/0147/F		14	This allocated site is too small to accommodate the proposals, is not adjacent to other available sites and has been developed.
	Edge of Bristol / Barrow Gurney / Long Ashton							
104.	The Vale/ South of Long Ashton/ Parsonage Farm/	20, 21, 22, 23, 26, 27, 28, 29, 33,	HE20110, HE20139, HE2018,			~400	~6,000	These sites have been assessed together given their geographical location. Part of the area benefits

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
	Land at Bridge Farm/ South east of A38/A4174 roundabout/ South of fitness centre near Long Ashton Park and Ride site/ Land at Yanley Lane/ Land at Gatcombe Farm/ Land west of A4174/ Yanley Lane/ Land north of Colliter's Way	343 and 364	HE2021, HE20286, HE20287, HE20288, HE20321 and HE20615					from draft allocations in the Emerging Local Plan totalling 2,715 dwellings across two sites. However, all of the sites lie within the Green Belt. Whilst some areas are proposed for removal from the Green Belt in the emerging plan, the current policy position is that they are still covered by this designation.
105.	Land west of Wildcountry Lane / Wildcountry Lane	24, 31	HE20276, HE2047			9.67		These sites have been considered together however the sites are physically separated from existing settlements and they are both located within the Green Belt. The size of the site is also below the lowest parameter.
106.	Land south of Weston Road/ Land at Gatcombe Farm/Builders Yard	25, 29 and 30	HE20277, HE20321 and HE2043			7.27		These sites have been considered together given their location. They are adjacent to the existing settlement however they are all located within the Green Belt. The size of the site is also below the lowest parameter.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
107.	Land off Ashton Road	32	HE20499			1.61		This site is too small to accommodate the proposal, is physically separated from other sites by the road network and is within the Green Belt.
108.	East of Dundry Lane near Barrow Tanks	34	HE2094			1.25		This site is too small to accommodate the proposal, isolated from other available land and is located within the Green Belt.
109.	Units A and C Estune Business Park, Long Ashton	219 and 220		4/705 and 4/707			42	These sites are too small to accommodate the proposal and not adjacent to other available land. They are within a small industrial area and the land adjacent to these sites is located within the Green Belt.
	Failand							
110.	Redwood Lodge Hotel and Country Club, Beggar Bush Lane	340			15/P/0574/F		124	This site has consent for a retirement care community of 124 apartments. The site is too small to accommodate the proposal, is isolated from other available land, is detached from a main settlement and lies within the Green Belt. The

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
								consented development has also been implemented.
	Nailsea							
111.	Land to the north of Nailsea / Northeast of Nailsea / Land at Jacklands Farm	52, 58 and 59	HE20136, HE20223 and HE20225			56.04	1179	These sites have been considered together given their geographical location to the north/ north east of Nailsea, however all of the land covered by these sites is within the Green Belt.
112.	Land adjacent to Sweet Briar, West End/Land at West End	230, 315		4/597	17/P/0712/O 20/P/1186/RM		10	These entries are the same site. The site is allocated in the SAP for 10 dwellings and permission was granted for 6 dwellings. The site is too small to accommodate the proposal and not immediately adjacent to other available land.
113.	Land off Trendlewood Way/Trendlewood Way	232, 313		4/595	18/P/5234/OUT 22/P/1295/RM		30	These entries are the same site. The site is allocated in the SAP for 30 dwellings and permission was granted for 24. The site is too small to accommodate the proposal and not immediately adjacent to other available land.
114.	Weston College site, Somerset Square	254		4/668	15/P/0997/O		30	This site is allocated in the SAP for 30 dwellings and a planning application was submitted in 2015

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
								for 28 units however this remains undetermined at the time of writing. The site is too small to accommodate the proposal and not immediately adjacent to other available land.
115.	Police Station	314					40	This site is allocated in the SAP for 40 units however is too small to accommodate the proposal and is isolated from other available land.
116.	Clifford House 59 High Street	284			21/P/1124/FUL		12	Permission was granted on this site in September 2021 for 12 apartments, however this site is too small to accommodate the proposal and isolated from other available land.
	Portishead							
117.	Land south of Portishead	35	HE201036			45.08	1,423	This site is located within the Green Belt and is isolated from the settlement of Portishead.
118.	North of Clevedon Road	36	HE20124			8.58	257	This site is located within the Green Belt.
119.	South of Cedar Way/West of Weston	37, 42, 43	HE20133, HE2067, HE2068			33.18	720	These sites are all located within the Green Belt.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
	Wood Road/Tower Farm							
120.	Off Clapton Lane/Land south of Clevedon Road	38, 41, 355	HE20134, HE20488,			3.18	98	One of these sites has a draft allocation however even together these sites together are too small to accommodate the proposal and are currently located within the Green Belt.
121.	Moor Farm	39	HE20222			36.14	750	This site is too large for the proposed development and is located within the Green Belt.
122.	South of Portis Fields	40	HE20292			2.85	85	This site is too small to accommodate the proposal and is located within the Green Belt.
123.	Harbour Road/Gordano Gate	193		4/665	16/P/2066/F		93	This site is too small to accommodate the proposal and permission has been granted on the site which has been implemented.
124.	Site V2, Harbour Road/ 49 Martingale Way/ Marine View	194, 287, 324		4/671	16/P/2855/F 18/P/3512/FUL 21/P/0301/FUL		152	When considered together, these sites have a capacity within the unit number parameters required for the proposal, however with the implementation of the approved schemes, the capacity is reduced and the sites cannot accommodate the proposed development.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
125.	Land south of Downside	255		4/644			23	This site is too small to accommodate the proposal and is isolated from other available sites.
126.	Elm Walk, Battens Orchard	320			17/P/0122/RM		14	This site is too small to accommodate the proposal and the consented scheme has been implemented.
127.	Severn Paper Mill/ South west of Severn Paper Mill	321, 322			12/P/2035/F4 14/P/1186/RM		139	Even when considered together, these sites are too small to accommodate the proposal and the consented schemes have been implemented.
128.	Land at Wyndham Way	325					35	This site is too small to accommodate the proposal and is isolated from other available sites.
	Tickenham							
129.	Golden Acres Fruit Farm, Clevedon Road	225		4/701			18	This site has a draft allocation in the Emerging Plan for 18 dwellings and consent was granted for the same number in 2021. The site and surrounding area are located in the Green Belt, it is too small to accommodate the proposal, not adjacent to other available land and the consented development has commenced.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
130.	Land at Tickenham Garden Centre, Clevedon Road	226		4/654	16/P/0032/O 20/P/0413/RM		32	This site is allocated in the SAP for 32 dwellings and planning permission was granted in 2017 for development including 32 dwellings. The site and surrounding area are located in the Green Belt, it is too small to accommodate the proposal, not adjacent to other available land and the consented development has commenced.
	Winford							
131.	Winford Coach Station, 10 High Street	341			12/P/0390/O 17/P/1146		11	This site is allocated in the SAP for 11 dwellings and outline and reserved matters applications have been consented. The site is too small to accommodate the proposals, is isolated from other land and the consented scheme has been built. The site is therefore not suitable or available.
	Wrighton							
132.	South of sports ground north of Cox's Green	186	HE20155			2.64	79	This site is too small to accommodate the proposal and is located within the Green Belt.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
133.	Land west of Garston's Orchard/ West of Butt's Batch	187, 188	HE2017, HE20198			6.45	142	Whilst these sites could theoretically almost accommodate the lower parameter for the number of homes proposed, they partly lie within Flood Zone 3b and have no flood defences and are therefore less sequentially preferable in flood risk terms. The site area is also below the lowest size parameter and couldn't accommodate the benefits of the proposal.
134.	Ridings Farm, East of Silver St	189	HE2033			7.88	206	This site lies within the Green Belt and is therefore not immediately available for development.
135.	Land at Cox's Green	215, 337		4/680	18/P/2691/RM		45	Planning permission has been granted on this site, it is not large enough for the proposal and development has already commenced.
136.	Gatcombe Farm Industrial Estate	288			21/P/0019/OUT		38	This site is too small to accommodate the proposal and not adjacent to other available land.
	Yatton							
137.	North End Road	106	HE201026			1.77	45	This site is too small to accommodate the proposals and is

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
								not adjacent to other reasonably available sites.
138.	Stowey Road	110	HE20179			3.98	119	This site is too small to accommodate the proposals and is not adjacent to other reasonably available sites.
139.	Land adjacent Yatton station/ Yatton Station	111, 275	HE20231	4/589		0.68	25	This site is too small to accommodate the proposals and is not adjacent to other reasonably available sites.
140.	East and west of Wemberham Lane/ Land to the east and west of Wemberham Lane	116, 274	HE20531	4/342			43	This site is too small to accommodate the proposals and is not adjacent to other reasonably available sites.
141.	East of Frost Hill, Yatton	117	HE2057			2.51	75	This site is too small and not immediately adjacent to other sites, it is also within the Green Belt.
142.	Land north east of Egret Drive, Arnolds Way, Yatton	218		4/687			8	Development has commenced on this site and there is minimal capacity remaining.
143.	Oxford Plasma Technology, North End Road, Yatton	236		4/524			55	This site is too small to accommodate the proposals and is not adjacent to other available sites.

No.	Site Name	Entry References in Spreadsheet	SHLAA January 2022 References	Housing Land Supply 2021 References	Planning Application References	Total Size (if known) in hectares	Total Estimated Capacity (No. of Dwellings)	Reasons for Discounting
144.	Arnolds Way Phase 1	328			14/P/0191/O 15/P/1498/RM		105	Planning permission has been granted on this site and the majority of the development has been completed.
145.	Arnolds Way, (Phase 2)	335			15/P/1488/O		200	Planning permission has been granted on this site and the majority of the development has been completed.
146.	Land north of Egret Drive	359			14/P/0191/O		8	This site is part of a larger permission that has mostly been completed.

APPENDIX 4
DETAILED SITE ANALYSIS

BackwellLand at Moor Lane and Grove Farm

- 1.1 The land to the north of Moor Lane (entries 45, 46, 49 and 62) has an estimated total capacity of 145 dwellings and site area of 4.64 hectares. Part of this land, adjacent to the development at Colliers Gardens, is subject to an outline planning application for up to 55 dwellings (reference: 22/P/0252/OUT), which is pending consideration with a recommendation for refusal on highway safety grounds. Even when considered together, these sites would be unable to accommodate an appropriate quantum of development due to the site size and therefore can be discounted on that basis.
- 1.2 Turning to the south, the land at and around Grove Farm (entries 66 and 356), it is logical that any additional development would be adjacent to the existing settlement to the north east with access taken from Moor Lane to the north (as a continuation of the improvements to Moor Lane currently under consideration under application reference 22/P/0252/OUT). They are currently unable to agree with the highway authority that a safe access can be achieved on Moor Lane for vehicles and pedestrians as both road and pavement widths are constrained. A section of the wider site (in the south west corner) is also designated as Green Belt. Although this site is an emerging allocation, as outlined in the Planning Statement the Council has delayed the consultation of the revised Local Plan to at least Summer 2023 and we consider this delay, alongside the issues around highway safety, demonstrates that there is not a reasonable prospect of this site coming forward in the timescales envisaged for our proposed development.
- 1.3 In addition, the site is also located in Greater Horseshoe Bats Habitat area and will have greater sensitivity in terms of impacts on habitat for bat foraging. The majority of the site is classified as Grade 2, 3a or 3b agricultural land and part of the site is also within a Groundwater Source Protection Zone. There are a number of Grade II Listed buildings adjacent to the site, with Backwell West Town Conservation Area located to the south.

Farleigh Farm (entries 55, 61 and 282)

- 1.4 Some of the land at Farleigh Fields (entry 55) is owned by Persimmon Homes Severn Valley. Permission was granted at appeal in June 2022 (APP/D0121/W/21/3285624) following the refusal of permission by North Somerset Council (21/P/1766/OUT) in September 2021 for 125 dwellings (entry 282). This part of the site is being advanced by Persimmon Homes however the development approved is different to the proposal as it offers a lesser amount of affordable housing and does not include land for Use Class E. The remainder of the site only currently has an agricultural access and there is currently no solution where an

appropriate residential access can be achieved. Policy SA7 of the Sites and Policies Plan Part 2 also allocates part of this site as Local Green Space and planning permission for development which is considered to adversely impact a designated Local Green Space will only be granted in very special circumstances. On this basis, there is not a reasonable prospect that this site is available to be developed at the point in time envisaged for the proposed development. The site is also classified as Grade 2 and 3a agricultural land.

- 1.5 The land to the North of Church Lane (entry 61) has a capacity of just 36 units. As such, even if this was considered with the remaining capacity at Farleigh Fields, totalling 136 homes, it would be unable to accommodate an appropriate quantum of development and therefore can be discounted on that basis.

Banwell, Bleadon, Hutton, Locking, Uphill and Weston-super-Mare

Land at Ebdon Road and Lyefield Road

- 1.6 This site covers a large area to the north of Weston-super-Mare. Land north of Wick St Lawrence (Entry 95, SHLAA: HE20493) is within Flood Zone 3 according to the EA's Flood Risk Map however does not benefit from flood defences. This site has therefore been discounted as an alternative site as it is not sequentially preferable in terms of flood risk. Part of the site is also a priority habitat. The land to the south at Orchard House, Ebdon Road is allocated in the SAP for 12 dwellings and whilst close to the larger area, it is separated by Ebdon Road and could not accommodate the proposed development.
- 1.7 Land at Greenways Farm, Lyefield Road (entry 87, SHLAA: HE2027) is within Flood Zone 3 according to the EA's Flood Risk Map and benefits from flood defences. There are also extensive parts of the site at low, medium and high risk of flooding from surface water. The site is located outside of the settlement boundary in the adopted Sites and Policies Plan Part 2 and the Preferred Options Plan. The site is also part of a priority habitat. This section of Lyefield Road is a narrow lane and it is not clear how a safe and suitable solution for a residential access would be achieved. On this basis, there is not a reasonable prospect that this site is available to be developed at the point in time envisaged for the proposed development.
- 1.8 Land to west of Anson Road (Entry 97) is subject to an outline planning application with a resolution to grant for up to 70 dwellings (Ref: 21/P/3529/OUT). This site is therefore likely to be coming forward separately.
- 1.9 Sites to the north of Lyefield Road and Lower Norton Lane: South of Manor Farm (entry 90, SHLAA ref: HE20354) and Rose Tree Farm (entry 94, SHLAA: HE20471) have a combined area of 6.21 hectares and estimated capacity within the SHLAA of 187 dwellings.

Rose Farm to the east is distinctly separated from the existing settlement and would therefore rely on the Manor Farm site to act as a first phase of development given its closer perceived relationship to properties to the south of Lyefield Road. Access to both sites would be challenging and delivering up to 190 dwellings on the narrow Collum Lane or Lyefield Lane would require extensive engineering assessments to establish if safe accesses could be created. As such, these sites would not be capable of achieving the proposal at the time envisaged for the development due to the need for phasing and access arrangements.

Land at Bourton

- 1.10 Land at Bourton (Entry 96, SHLAA HE20494) is within Flood Zone 3 according to the EA's Flood Risk Map and does not benefit from flood defences. This site has therefore been discounted as a less sequentially preferable site.
- 1.11 In addition, there are also parts of the site at low and medium risk of flooding from surface water. The site is located within close proximity to the Seven Estuary SAC, Biddle Street Yatton SSSI and Puxton Moor SSSI and is covered within their Impact Risk Zones. Part of the site is also a priority habitat. There is a Grade II listed farmhouse located to the west of the site and three Grade II listed farmhouses located to the north of the site.
- 1.12 The site is also located in close proximity to the railway line and M5, so there are concerns regarding noise and air pollution as well as the presence of pylons on site. These further environmental concerns also make the site less desirable for residential development than the land at Rectory Farm.

Land south of Herluin Way (Avoncrest Site)

- 1.13 Land south of Herluin Way (Avoncrest Site) (Entry 264) is allocated for up to 750 dwellings as well as a school, 2.5 hectares of employment and other works in the SAP and preferred options Plan, however no planning application has yet been submitted. There is concern locally (as mentioned by Cllr Crockford-Hawley) that there are major contamination issues on the site that would need to be overcome, which may have an impact on the viability of the site and delivery timescales.
- 1.14 There is therefore uncertainty about whether the site will come forward. Small areas of the site are in Flood Zones 2 and 3 and subject to low and medium risk of surface flooding according to the EA's Flood Risk Maps. The site is also located to the east of the Severn Estuary SSSI/SPA/SAC and Ellenborough Park West SSSI and within the SSSIs Impact Risk Zone.

- 1.15 On this basis, there is not a reasonable prospect that this site is available to be developed at the point in time envisaged for the proposed development. The issues regarding contamination and the proximity to the SSSI/SPA/SAC also make it less desirable for residential development than the site at Rectory Farm.

Land to the south of Locking Moor Road (A371) (Oaktree Park and Elm Grove Nurseries)

- 1.16 The majority of Land to the south of Locking Moor Road is allocated as a strategic gap (between Weston-super-Mare, Hutton, Parklands Village and Locking). Oaktree Park (Entry 80, SHLAA ref: HE201037) is entirely located in the strategic gap and has a capacity of just 105 dwellings. Land to the south of Moor Park (Entry 103, SHLAA: HE208) is currently in employment use and part of the area forms a draft allocation for employment development in the Preferred Options Plan. Both of these sites are located with Flood Zones 2 and 3 and are subject to low and medium surface water flooding according to the EA's flood risk maps.
- 1.17 Land at Elm Grove Nurseries (Entries 101 and 345 and SHLAA ref: HE207) was subject to an outline planning application (18/P/2652/OUT) for up to 110 dwellings, which was dismissed at appeal on 16th December 2019 due to the harm the development would have on the strategic gap. A small part of this site (the eastern parcel only) is a draft allocation in the Preferred Options Plan for 50 dwellings and will therefore provide a significantly reduced number of dwellings which cannot accommodate the proposal.
- 1.18 On this basis, there is not a reasonable prospect that this site is available to be developed for residential at the point in time envisaged for the proposed development. There is no reason to believe the land south of Moor Park will not come forward for employment development and the majority of the land is within the strategic gap. The proximity to the SSSI/SPA/SAC and the surface water flooding also make these less desirable for residential development than the proposed site. Even if the allocated part of Elm Grove Nurseries were to come forward at the point in time envisaged for this proposed development, this would not deliver the necessary quantum of development and can be discounted on this basis.

Woodspring Stadium and Winterstoke Road

- 1.19 Land to the west of Winterstoke Road (Entry 258, SHLAA HE20433) is allocated within the SAP and the wider parcel of land encompassing the Woodspring Stadium (entry 348) is a draft allocation in the Preferred Options Plan. There is a hybrid planning application (reference: 21/P/2190/OUT) on part of the site for a new hospitality facility and 5 storey high residential development of 99 flats (30% to be affordable housing) which is still pending consideration.

- 1.20 There has been no planning application submitted on the land to the south (although it is under the control of Persimmon Homes Severn Valley). The on-site sports pitch would require relocation or contributions towards provision and no progress has been made to date to address this. On this basis, there is not a reasonable prospect that this site is available to be developed at the point in time envisaged for the proposed development.
- 1.21 Nearly all of the site is located in Flood Zone 3 (but benefitting from flood defences) and subject to low and medium risk of surface flooding according to the EA's Flood risk Maps. The site is also located to the east of the Severn Estuary SPA, SSSI and Ramsar, and Ellenborough Park West SSSI, Mendip Limestone Grasslands SAC, Uphill LNR and SSSI and within the SSSIs Impact Risk Zone.
- 1.22 The development of the northern area for 99 flats alone, would be unable to accommodate an appropriate quantum of development and therefore can be discounted on that basis. The capacity quantum can only be achieved through higher density proposals such as flats, which is a different type of development to that proposed with this application. The sites are therefore unable to

Land to the south of Knightcott Road – Knightcott Gardens and Western Trade Centre

- 1.23 The land at these sites which form part of the January 2022 SHLAA have a capacity of approximately 144 dwellings. This land also accommodates two draft allocations in the Preferred Options Plan. The area at Western Trade Centre, which has permission for 10 dwellings (15/P/0968/O) and a draft allocation for 10 dwellings and the land to the south of southern Knightcott Gardens, which has a draft allocation for 37 dwellings.
- 1.24 There have been several recent planning applications on these parcels of land, notably the following:
- Screening opinion for residential development up to 155 dwellings (14/P/2637/EIA1). EIA required;
 - Outline planning permission for 155 dwellings (15/P/0248/O). Refused by SoS and Appeal dismissed;
 - Scoping opinion for 155 dwellings (15/P/1658/EIA2). Withdrawn;
 - Scoping opinion for 155 dwellings (15/P/0908/EIA2). Considered that the proposed scope and content of the Scoping Opinion will adequately address any impacts on ecological receptors;
 - Outline application for 145 dwellings (16/P/0753/O). Refused;
 - Outline planning permission for 47 dwellings (17/P/2111/O). Refused and appeal dismissed;

- Outline planning permission for 20 dwellings (18/P/3180/OUT). Refused;
- Outline planning permission for 20 dwellings (20/P/2257/OUT). Refused and appeal dismissed; and
- Outline planning permission for 33 dwellings (13/P/0425/O). Refused and appeal dismissed.

1.25 All of these applications have been refused by North Somerset Council and where decisions have been appealed, they have been dismissed. The reasons for refusal and dismissal are on the grounds of harm to the character and appearance of the area; the impact on landscaping; and the impact on the AONB. On the basis of this planning history and without changes to the local plan, upcoming applications on this land are also likely to be refused on visual and landscape grounds.

1.26 The remaining land which is a draft allocation to the south of Knightcott Gardens only has a capacity of 37 dwellings, which is not large enough to accommodate the proposal. As such, this site would not be reasonably available for the proposal at the time envisaged for the development.

Gas Works

1.27 Whilst this site is allocated in the SAP for 240 dwellings, a planning application has never been submitted. The Preferred Options Plan draft allocation for this site is for only 95 dwellings. The draft allocation capacity appears to take account of the significant constraints on this site, including proximity to the A370 and associated noise issues, contamination issues, the majority of the site being within Flood Zone 2 and areas at risk of surface water flooding. As such, it is considered that the draft allocation capacity of 95 dwellings is more realistic for this site. Therefore the site cannot accommodate the development proposed at Rectory Farm.

Station Gateway and Weston Rugby Club

1.28 These sites are adjacent to each other, separated by Sunnyside Road North and the railway line. The Station Gateway Site is allocated for 300 dwellings in the SAP, however the site is bisected by the A370 and railway line and the emerging Local Plan splits it into two separate draft allocations with a combined capacity of 350 dwellings: Locking Road Car Park to the north (230 dwellings) and Sunnyside Road to the south (120 dwellings).

1.29 The Rugby Club Site is to the south of the Station Gateway sites and has a draft allocation in the emerging Local Plan for 200 dwellings. When combined with the closest adjacent part of the Station Gateway draft allocation, there is an estimated capacity of 320 dwellings

to the south of the railway line. Given that the other part of the Station Gateway draft allocation is on the opposite side of the A370 dual carriageway and railway line, it would not be feasible to accommodate the proposal across this main road, therefore the sites have been discounted on connectivity grounds.

- 1.30 There are also several constraints to developing the remainder of the Station Gateway and Rugby Club sites which may reduce their capacity further. Buffer zones are likely to be required between along the A370 and train station boundaries due to air quality and noise issues and there are also potentially issues with contamination. A further concern is the loss of the sports pitches at the Rugby Club which, as mentioned, requires alternative provisions which can be a timely process and subject to extensive consultation including bodies such as Sport England.
- 1.31 These sites are therefore assessed as not being able to suitably accommodate the proposal at the time envisaged for the development.

Dolphin Square

- 1.32 The site is allocated in the SAP for 220 dwellings. However, it has been carried forward to the draft Local Plan with a reduced allocation for 80 dwellings. This could be due to noise constraints from the adjacent leisure uses given that the site is not located in a residential area, as well as flood risk issues given that the site falls within Flood Zones 2 and 3a. The town centre location could not accommodate the significant open space and biodiversity benefits of the proposal.
- 1.33 Given the constraints and reduction in dwelling numbers within the draft Local Plan, it is not considered that the site would be capable of accommodating the development proposed at Rectory Farm.

Land to the east of the M5 J21

- 1.34 The land to the east of Junction 21 of the M5 includes large areas of land submitted through the Call for Sites process and included within the January 2022 SHLAA. The land is bounded by the railway line to the north and the A371 to the south. None of this land is allocated with the SAP, however there are two draft allocations within the Preferred Options Plan. One is for 54 dwellings at land to the west of Wolvershill Road (entry 238) and the second is for 2,800 dwellings at Wolvershill (north of Banwell) which is a strategic allocation (entry 342).
- 1.35 Part of the land these sites cover is safeguarded for the Banwell Bypass through policy DM20 of the Sites and Policies Plan Part 1 (Development Management Policies) as a major

transport scheme. A planning application was approved in March 2023 (22/P/1768/R3EIA) for the construction of a 3.3km road from the A371 Summer Lane to A368 Towehead Road, with North Somerset Council as the named applicants. The Planning Statement sets out the need for intervention on this part of the highway network and that £97.1m of Housing Infrastructure Funding (HIF) was secured by NSC in 2019. The assessment of sites within this area has therefore been carried out on the basis that the submitted scheme is likely to be progressed.

West of Wolvershill Road and north of Wolvershill Park, Banwell

- 1.36 The site to the west of Wolvershill Road and north of Wolvershill Park, Banwell (HLS ref: 4/703 – entry 238) has outline and reserved matters permissions (18/P/4735/OUT and 21/P/1735/RM) for 54 dwellings and conditions attached to the permissions are being progressed. There is an element of physical separation between this site and the other promoted land to the east of the M5, meaning that the site could not practically be considered in conjunction with adjacent land.
- 1.37 As another developer is progressing the site; it is relatively isolated from other available land; and it is below the lower capacity threshold required, this site would not be reasonably available for the proposal at the time envisaged for the development.

Sites at Wolvershill, north of Banwell

- 1.38 This group of sites within the January 2022 SHLAA cover a substantial area which is largely covered by the draft allocation at Wolvershill within the Preferred Options Plan, which has a capacity of 2,800 homes. The site borders the M5 to the west and is partially connected to Wolvershill Road to the north and the A371 (Knightcott Road) to the south.
- 1.39 The Preferred Options Plan states that a single masterplan and supporting design codes will need to be prepared to guide the coordinated and comprehensive development of the site and a suitable phasing strategy will be required (Policy LP1). The proposed development is expected to have first completions in 2025, which would not be achievable on this draft allocation site given the need for a site wide masterplan, which would require extensive consultation with landowners and their representatives. As such, the site would not be reasonably available for the proposal at the time envisaged for the development.

HE20496 – Land east of J21

- 1.40 The land to the east of Junction 21 of the M5, to the north of Wolvershill Road, has an estimated capacity of 2,000 homes and extends over an area of 154.51 hectares. Due to its size, the site would have to come forward in a phased manner as part of a long term

strategic development. The only point at which the site could be accessed would be via Wolvershill Road, however given the sparsity of this location, development in this location would be detached from existing built form creating an isolated and unsustainable proposal. There would also be noise and air quality constraints which would need to be considered as part of any proposal. As such, this site would not be reasonably available for the proposal at the time envisaged for the development.

East of Banwell at Eastermead Lane and East of Riverside

- 1.41 The east of Banwell at Eastermead Lane and East of Riverside (entries 121 and 124) are two sites with estimated capacities of 300 and 145 dwellings respectively. The site at Eastermead Lane is partially intersected by the proposed Banwell Bypass, with other areas of the site earmarked for environmental mitigation for landscape integration and a construction compound area. Approximately half of the site lies within the red line boundary of the Bypass application, which in addition to the construction compound, significantly reduces the capacity of the site, particularly in the short term.
- 1.42 The plans submitted with the Bypass application show the existing road to the south (A368) to be removed and landscaped. Access to the remaining land at Eastermead Lane would therefore not be possible as a standalone site and would only be feasible through the land to the East of Riverdale. This would be challenging as Riverside is accessed via Church Street, both of which are very narrow roads and are likely to have capacity constraints.
- 1.43 The site also contains overhead powerlines which reduce capacity further and listed buildings in close proximity, the setting of which would need to be considered as part of any application. These sites would therefore not be sequentially preferable to the application site as they could not reasonably accommodate the proposal at the envisaged time of development.

Land to the East of Wolvershill Road, Goding Lane and Orchard Close

- 1.44 These sites lie between Wolvershill Road and Riverdale, with a combined estimated capacity of 444 dwellings.
- 1.45 The land at Orchard Close (123) has an estimated capacity of 14 dwellings and is separated from the other land by green fields and existing development. The site is therefore isolated from other available land. In addition, access would only be available via a narrow access track at the end of Orchard Close, or by cutting through the development at Taylors Fields to the north west. This parcel of land and the access arrangements could not accommodate the capacity of the proposal development and therefore it is not an appropriate site.

- 1.46 The sites to the East of Wolverhill Road and at Goding Lane are located on opposite sites of Goding Lane which is a narrow agricultural access with development at its junction with both Riverside to the east and Wolverhill Road to the west, restricting the ability to increase its capacity. Taylors Fields would be the only reasonable access into the land at Goding Lane, which has a capacity of 30 dwellings and therefore cannot accommodate the proposals in isolation.
- 1.47 The land to the East of Wolverhill Road, to the north of Goding Lane, is isolated from existing development with the exception of bordering ribbon development along Wolverhill Road. Access would require the demolition of buildings on Wolverhill Road, as this is the only point at which the site adjoins the highways or other built form. The proposed plans for the Banwell Bypass as mentioned above, would intersect the land to the East of Wolverhill Road. The remaining land to the north would be completely severed and isolated from all built form and therefore unsuitable for residential development.
- 1.48 The unsevered land which could still have a connection to Wolverhill Road would be considerably smaller in size and irregular in shape. Even if amalgamated with land to the south of Goding Lane, the sites would not be suitable for the proposed development by means of its size, shape, access arrangements and distance to existing built form.

Land at Elborough

- 1.49 The land at Bury Farm (entry 78, SHLAA ref: HE201025) has a theoretical capacity of 101 dwellings. Whilst close to other available land nearby, it does not adjoin any other sites and a detached development across these sites would be disjointed and impractical. As such, this site is discounted as, alone, it would not be able to accommodate the development proposed.
- 1.50 The land at Devil's Elbow Farm and North of Banwell Road (entries 86 and 100 and SHLAA refs: HE20237 and HE20637 respectively) have a combined theoretical capacity of 525 dwellings. It is however noted that they do not adjoin either the existing or proposed settlement boundary and there are a lack of local services and facilities in its proximity. As such, its development would not be in accordance with either the existing or proposed development strategy for North Somerset.
- 1.51 Notwithstanding the above, there are also a number of constraints to development across the wider site. The main constraint is the sites proximity to the Mendip Hills AONB, with the western half of the southern boundary adjoining the AONB. It is considered likely that the AONB would object to any planning application for residential development on the site and that there would be an unacceptable harm to the setting of the AONB.

- 1.52 Given the above and particularly the isolated location of the sites on the boundary of the AONB, it is not considered that the site is in a suitable location for residential development and is not sequentially preferable to the proposal at Rectory Farm.

Oldmixon Road

- 1.53 The site at Oldmixon Road is allocated for residential development in the SAP and has planning permission (ref: 16/P/0150/O which was allowed at appeal and 20/P/0377/RM) for 130 dwellings. The development is under construction and therefore it is not available for the proposed development.

Land off Bridge Road and at Bleadon Quarry – Bleadon

- 1.54 The land off Bridge Road has an estimated capacity of 150 dwellings in the April 2022 SHLAA. The site at Bleadon Quarry is on the opposite side of Bridge Road and has outline permission for 42 dwellings (19/P/0835/OUT). A Reserved Matters application was submitted in August 2022 (22/P/2113/RM) and several discharge of condition applications have been submitted in connection with the Outline application. The land at Bleadon Quarry is therefore being brought forward separately to the land to the west of Bridge Road and is not currently available.
- 1.55 The land off Bridge Road was subject to a planning application (17/P/5545/OUT) for 200 dwellings including a health centre, GP surgery, retail outlets and office/employment space. Permission was refused and an appeal was dismissed (APP/D0121/W/18/3211789) for reasons of harm to the character and appearance of the area and the AONB; flood risk; and ecological matters.
- 1.56 This site does not meet the lower threshold required in terms of size and capacity, being 6.18 hectares with a capacity of 150 dwellings and therefore could not deliver the proposal and its benefits. Further the constraints, issues and reasons for refusal raised through the previous application and appeal do not present a case which for this land being sequentially preferable to the application site.

Weston Villages

- 1.57 The Weston Villages are the strategic housing allocations in North Somerset. Policy CS30 of the Core Strategy outlines the aspirations for the delivery of 6,500 dwellings across two mixed-use sustainable new communities: Parklands Village and Winterstoke Village. The Weston Villages cover large sites in Weston-super-Mare and a range of housebuilders are involved in the development, including the Applicant for this development: Persimmon

Homes Severn Valley. Development has commenced on the Weston Villages and many homes are occupied, with development continuing. The Weston Villages sites are:

Weston Villages – Parklands Village (Former RAF Locking Site) (north)

1.58 This site has an estimated capacity of 4,000 dwellings and is being developed across several phases and by different developers.

Locking Parklands (4/558a-c) and former leisuredome site

1.59 The southern part of the allocation was the first to be developed and include the following permissions, giving a total of 1,450 dwellings:

- 09/P/1614/F – Full permission for 100 dwellings
- 12/P/0760/F – Full permission for 150 dwellings
- 13/P/0997/OT2 – Outline permission for 1200 dwellings and other development

1.60 A total of 433 dwellings have been approved through reserved matters applications in connection with the outline permission, which are the following:

- 168 dwellings approved April 2016 (LPA ref: 15/P/1777/RM - Phase 3)
- 15 dwellings approved December 2018 (LPA ref: 17/P/5631/RM – Phase 12)
- 27 dwellings approved October 2019 (LPA ref: 18/P/2925/RM – Parcel 12A) – St Modwen
- 99 dwellings approved September 2019 (LPA ref: 19/P/0032/RM – Phase 5) – St Modwen
- 124 dwellings approved July 2022 (LPA ref: 21/P/3241/RM – Phase 4) – Curo Homes

1.61 The site therefore has an outstanding capacity of 767 dwellings which have outline consent through application 13/P/0997/OT2 however do not have Reserved Matters approval. Most of the remaining land is located within the centre of the allocation and adjacent to the spine road. The development of this land would be required to comply with the conditions and obligations associated with the outline permission which only offers a 30% provision of affordable housing. The application at Rectory Farm proposes 50% affordable housing, which is greatly needed in North Somerset, and which the extant permission on this land does not offer. The site is therefore not available for the proposed development at the time envisaged.

South of Locking Head Drive

- 1.62 The north and north west part of the allocation are covered by an outline planning permission (reference 16/P/2758/RG4) for 700 dwellings dated January 2018. They are covered by entry 4/558e in the April 2021 Housing Land Supply Trajectory. This site is set further beyond the initial phases of the development which are located to the south. There is a link road through the earlier phase into this section of land. Reserved Matters approval was granted on the eastern part of the site for 425 dwellings in August 2022 (21/P/1220/RM) with the Applicant being Keepmoat Homes. This part of the site is therefore not available to the Applicant of this proposal. This development is crucial to unlocking the remaining land within the outline permission, as there is not another access to the remaining land. Therefore, the delivery of the outstanding 275 homes is dependent upon the implementation and delivery of the Keepmoat scheme.
- 1.63 As outline above, the development of this land would be required to comply with the conditions and obligations associated with the outline permission which only offers a 30% provision of affordable housing, whereas the application at Rectory Farm proposes 50% affordable housing. On these grounds, the remain part of this site is not reasonably available for the proposal at the time envisaged for the development.

Moss Land

- 1.64 To the west of the allocation is a St Modwen development which was granted outline planning permission in January 2018 for 300 dwellings (16/P/1881/OT2) and reserved matters permission for 248 homes in January 2020 (19/P/1563/RM) across the full site area. This development has been substantially completed and therefore cannot accommodate the proposal.

Land to the south of Churchland Way and Mead Fields

- 1.65 The land at the east of this allocation is covered by entries 4/558d and 4/558g in the April 2021 Housing Land Supply Trajectory. Outline consent has been granted for a total of 1,400 homes (12/P/1266/OT2 for 1,150 and 16/P/2744/OT2 for 250) and a total of 674 homes have been approved at Reserved Matters stage:
- 12/P/1266/OT2:
 - 223 dwellings approved September 2018 (ref: 17/P/5586/RM)
 - 136 dwellings approved October 2019 (ref: 18/P/5209/RM)
 - 150 dwellings approved May 2019 (ref: 18/P/5231/RM)
 - 77 dwellings approved August 2021 (ref: 20/P/3081/RM)
 - 16/P/2744/OT2:
 - 88 dwellings approved February 2020 (ref: 19/P/2662/RM)

- 1.66 The Applicant was involved in a planning appeal in Spring 2022 (PINS: PP/D0121/W/21/3285624) whereby a housing land supply proof of evidence was prepared. At the time, the expert witness discussed the proposals with a representative of Mead Realisations, who retain the balance of the remain part of this site and advised that they had no proposals to bring forward further dwellings within the 5-year period beyond those already secured through reserved matters approval. The sites with reserved matters approval are all being brought forward by house builders and development is ongoing at the site. These are therefore not available to the Applicant. There are also a range of conditions and obligations that need to be met on the remaining part of the site, including ground conditions that need to be addressed and the need to deliver a second access from the Morrison's roundabout. The outline permissions also only require 30% affordable housing which is not the same as the amount proposed with this application. On this basis, the remaining capacity at the east of this allocation is not reasonably available for the proposal at the time envisaged for the development.
- 1.67 The land at Westhay Farm (SHLAA ref: HE2039) lies immediately adjacent to the allocation and has an estimated capacity of 62 dwellings. Given its size, it would need to be brought forward in conjunction with other available sites. As Mead Realisations have no proposals to bring forward the land around this site, the land at Westhay Farm would not be capable of accommodating the proposal.

Land to the west of the M5, East of Trenchard Road and West of Trenchard Road

- 1.68 This site is a draft allocation in the emerging Plan and occupies an area of land to the east of Locking Parklands and south of the Taylor Wimpey and Mead site. Outline planning permission was granted in November 2020 (18/P/3038/OUT) for 75 dwellings and a reserved matters application for 74 dwellings was submitted in August 2022 (22/P/1860/RM). The adjacent land to the west has already been developed as part of the Locking Parklands proposal and the land to the north is part of the area under the control of other developers and is not expected to come forward within 5 years. As such, the capacity of the site is restricted to 75 dwellings and therefore cannot accommodate the proposal at the time envisaged.

Locking Farm

- 1.69 The site at Locking Farm (SHLAA reference: HE2032) is to the west of the allocation and is noted in the SHLAA as being approximately 16.38ha in size with an estimated capacity of 495 dwellings. Whilst adjacent to Locking Parklands allocation, there is separation to

the other residential areas and an application was approved in September 2021 for a school (21/P/1596/FUL) on a large part of the land covered by this SHLAA entry.

- 1.70 This greatly reduces the size and therefore capacity of the site to the western extent only. Further, this remaining element of the site lies within Flood Zone 3b and therefore represents a sequentially worse situation than the application site in terms of flood risk.

Weston Villages – Winterstoke Village (Former Weston Airfield) (south)

- 1.71 The second Weston Village site is at the former Weston Airfield. Two outline applications and several reserved matters applications have been approved on the site, as follows:

- 10/P/0756/OT2 – Outline permission for 900 dwellings approved August 2012
 - 269 dwellings approved November 2013 (13/P/0834/RM) Parcels H6, H8, H9, and H10
 - 251 dwellings approved June 2015 (14/P/2723/RM) Parcels H5, H7, and H11
 - 95 dwellings approved April 2016 (15/P/2437/RM) Parcel H2
 - 43 dwellings approved April 2016 (15/P/2570/RM) Parcel 10B
 - 240 dwellings approved March 2017 (16/P/1842/RM) Parcels H1, H3, and H4

- 12/P/1510/OT2 – Outline permission for 1,650 dwellings approved in January 2018:
 - 54 dwellings approved July 2019 (18/P/2337/RM) Parcel H19
 - 375 dwellings approved February 2020 (18/P/2867/RM) Parcels H14 and H15
 - 300 dwellings approved November 2021 (20/P/2026/RM) Parcels H18 (A and B)
 - Application submitted for 220 dwellings in October 2022 (22/P/2427/RM)

- 1.72 Persimmon Homes Severn Valley are the sole developers of this site. The first outline permission has reserved matters approval for 989 homes and the site is substantially completed. The second outline permission has reserved matters approval for 729 homes and a further 220 pending consideration. There is an outstanding balance of 701 homes from the outline permission whereby reserved matters permission has not yet been sought.

- 1.73 The Applicant has provided a phasing plan at **Appendix 5** to show the areas where development can still come forward: Parcels H12 and H13 to the west, H16 and H20 to the north and east and H21 and H22 to the north west. As was the case with the allocation at Locking Parkway, the extant consent requires a 30% affordable housing provision. The proposal at Rectory Farm is for 50% affordable housing and therefore is a different development which could not be dropped into this site which has an extant consent, as they are fundamentally different proposals. The outstanding land at Weston Airfields is therefore not available for the proposal at the time envisaged for the development.

Churchill, Sandford and Winscombe*Land adjacent to Bath Road and Says Lane, Churchill**Land to the east of Says Lane*

- 1.74 The most recently determined planning application submitted on the land to the south east of Langford (entry 137, SHLAA ref: HE20196) was for 25 dwellings (ref: 17/P/2344/O) in September 2017. The planning application was refused and subsequently appealed (ref: APP/D0121/W/18/3207635). Despite the Council not being able to demonstrate a five-year housing land supply, the appeal was dismissed in March 2019 for two reasons:
- The proposal would not be in accordance with the Core Strategies settlement strategy.
 - The proposal would be harmful to the character and appearance of both the immediate locality and the wider landscape. It would erode the rural character of the eastern approach to the village, being on the opposite side of the A38 and disjointed from the settlement boundary, and would fail to conserve or enhance the character, distinctiveness, or quality of the surrounding landscape. The Inspector considered that the resultant harm would be considerable and would negatively impact on the intrinsic character and beauty of the countryside.
- 1.75 A more recent planning application for nine dwellings was validated in January 2023. The number of dwellings proposed has been reduced and located within the north western corner of the site, presumably to address landscape concerns. The majority of consultee comments are still outstanding, including on landscape impact, and the application is not due to be determined until March 2023.
- 1.76 The policy basis for the appeal decision is still the development plan for the area. For reasons detailed earlier in this Report, the emerging Local Plan is afforded limited weight at this stage. As such, it is considered that the Inspector's reasons for refusal will still be applicable to this site now.
- 1.77 Notwithstanding the above, the Council's SHLAA identifies that this site has an estimated capacity of 78 dwellings, however this does not appear to take account of a number of constraints. There are several TPOs within the Site, four of which are located within the middle. The eastern boundary is constrained by drainage ditches, as is the northern boundary alongside the A38. Overhead power lines run across the site from north east to west. These may require a development stand-off. PRoWs also run along the western and

eastern boundaries. Parts of the site are also subject to surface water flooding, with some parts being at high risk. Given the above constraints, as well as the context of the 2019 appeal decision and the recent application for 9 dwellings, it is unlikely that the estimated capacity of 78 dwellings could be achieved on the Site.

- 1.78 The adjacent site at land off Says Lane (entry 132, SHLAA ref: HE201013) has an estimated capacity of 88 dwellings. Given the site's location and that the development plan for the area has not changed since the 2019 appeal decision on the adjacent site as detailed above, it is considered that this site would also be unsuitable for development due to both its location and impact on both the immediate and wider landscape. In addition, cumulatively the land could not accommodate the proposal with the constraints presented.

Land to the west of Says Lane

- 1.79 The land to the south of the A38 and at Bath Road (entries 136 and 141 and SHLAA refs: HE20122 and HE20629) are subject to a number of site constraints which would reduce their estimated capacity within the SHLAA (243 dwellings). The Sites include PRoWs, a restricted byway, areas at risk from surface water flooding, overhead power cables and existing vegetation / trees, including one TPO. In addition, located to the north east along the Bristol Road is the Grade II listed 'Turnpike Trust Mile Marker'. The sites would also draw the settlement of Churchill closer to the boundary of the Mendip Hills AONB. As such, a buffer zone may be required as part of any future development.
- 1.80 Part of the site is subject to a planning application (ref: 22/P/0564/OUT) for 68 dwellings (set against an estimated SHLAA capacity of 225 dwellings), which was submitted in March 2022 and is awaiting determination. The planning application has been subject to a number of objections, including from the AONB, who have raised concerns regarding the impact on the setting of the AONB; the Flood Risk Management Team who have requested further information; Highways, who have raised 'concerns leading to refusal' regarding the proposed site access and refuse strategy; and Urban Design, who have raised a number of concerns including the overall suitability of the Site for development given its location away from the settlement boundary and in close proximity to the AONB. It is currently unclear when the application is likely to be determined.

Says Lane Sites Conclusion

- 1.81 This site in total is split into two parts, either side of Says Lane and it is considered that developing on two sides of Says Lane, a narrow land bordered by vegetation on each side, which are not immediately adjacent, would result in a disjointed development.

- 1.82 In addition to the above, the sites are subject to a number of constraints including TPOs, overhead power cables, surface water flood risk, proximity to the Mendip Hills AONB and PRowS. These would significantly reduce the theoretical combined capacity of 409 dwellings. Indeed, given the landscape concerns raised by the Inspector in respect of the 2019 appeal, it is considered that the land to the east should be discounted completely. Furthermore, given the level of objection from statutory consultees to the existing planning application for 68 dwellings, particularly from a locational perspective, it is considered the land to the west is also unsuitable for the level of development required by this proposal.

Land between Pudding Pie Lane and Jubilee Lane, Churchill

- 1.83 The land at Pudding Pie Lane East (entries 208 and 332 and HLS ref: 4/634) was allocated in North Somerset's Sites and Policies Plan for 141 dwellings. In October 2016, outline planning permission was approved for 141 dwellings and community uses (ref: 15/P/1414/O) followed by Reserved Matters approval in December 2017 (ref: 17/P/1894/RM). The planning permission has been implemented and there have been a number of completions on site. As such, the site is not suitable for the proposed development.
- 1.84 Land at Pudding Pie Lane West (entry 277 and HLS ref: 4/651) is located to the north of Pudding Pie Lane, opposite Churchill Primary School. It is allocated in North Somerset's Sites and Policies Plan for 35 dwellings. Outline planning permission was granted in January 2018 (ref: 15/P/2521/O) for 35 dwellings. The permission required the submission of Reserved Matters within three years of the grant of permission, however there is no evidence of the submission of a Reserved Matters application coming forward. Therefore the outline planning permission has expired. Given that the site has had an allocation and planning permission but has not been built out, this raises concerns regarding deliverability and as such, the site is discounted.
- 1.85 The total land not covered by the permission under construction has a theoretical capacity of 191 dwellings and covers a site area 7.36 hectares. However, these sites have a number of constraints which do not appear to have been considered when calculating capacity. These include overhead power lines, PRowS, existing vegetation, areas at risk from surface water flooding, and the need to retain an existing dwelling on Land East of Ladymead Lane. As such, it is considered unlikely that the theoretical capacity of these entries can be met and regardless, the site area is below the lower parameter required for the proposal. Therefore that the quantum of development required for the proposal could not be accommodated on this site

North of Sandford (entry 174)

- 1.86 Land north of Sandford at Sandmead Road and Nye Road (entry 174, SHLAA ref: 20587) has an estimated capacity of 259 dwellings. The Sandmead Rhyne curves through the site and subjects a significant proportion of the site to low, medium and high surface water flood risk. The closest heritage asset is the Grade II listed 'Myrtle Farmhouse' which is located to the south west of the site and the Yanal Bog SSSI is located to the north east of the site. The site is located within its Impact Risk Zone.
- 1.87 The site is located within close proximity to the Thatcher's Cider Brewery, which may give rise to noise issues on the Site. Furthermore there is a tree nursery for Thatcher's located onsite. The loss of this for development could have an impact on the business of Thatcher's cider, as well as a loss of nature habitat, and relocation of this business could be a timely exercise. In addition, Sandmead Road and Nye Road are very narrow routes and are unlikely to be able to accommodate the quantum of development proposed. As such, it is considered that this site is not suitable for the proposal at the time envisaged for the development.

Claverham*Land at Brokley Way and Dunsters Road*

- 1.88 The land at Brokley Way and Dunsters Road lie to the north west of Claverham and have an estimated combined capacity of 300 dwellings.
- 1.89 An outline planning application for 70 dwellings (15/P/0185/O) was submitted on the southern part of the site but was withdrawn in September 2016. The reason for this is unclear.
- 1.90 There are a number of onsite constraints including overhead power lines, a PROW and proximity to two Grade II Listed Buildings which could reduce the theoretical capacity of the site. Despite this being 300 dwellings, the actual site area is just 8.53 hectares. The parameters set for the development of the proposal are between 10.3ha and 17.2ha. These sites do not achieve the minimum threshold set as part of the methodology, therefore these sites would not be able to accommodate the proposal and the benefits it brings. As such, this is not sequentially preferable to the application site.

Clevedon*Land east of Clevedon*

- 1.91 Land to the east of Clevedon (entry 1, SHLAA ref: HE20125) is located to the east of the M5, detached from the settlement of Clevedon. The site has a capacity of 2,500 dwellings and due to its size, the site would have to come forward in a phased manner as part of a long term strategic development, if at all. The site is in very close proximity to the M5 and it is unclear how a safe and suitable residential access would be achieved and is therefore less desirable for residential development than the land at Rectory Farm. There is also no support for this proposal in the emerging plan.
- 1.92 There are overhead power lines running through the site. It is within Flood Zone 3 (with the benefit of defences) and has areas of low and very low surface water flooding according to the EA's Flood Risk Mapping. There are watercourses such as the River Kenn running through and adjacent to this site. There are three Grade II Listed Buildings located within the site and one located adjacent to the southern boundary.
- 1.93 As such, there is not a reasonable prospect of this site coming forward in the timescales envisaged for the proposed development.

Land to the north of Colehouse Lane and west of Kenn Road

- 1.94 Land to the north of Colehouse Lane (SHLAA ref: HE20208) is separated from the settlement of Clevedon by the River Blind Yeo (to the north) and is located outside of the settlement boundary in the emerging Local Plan. Part of the site is within the Clevedon Neighbourhood Plan Area, however, this is only in draft. Clevedon transmittal station is located to the south western corner of the Colehouse Lane site and approximately half of the site is a caravan park which has a long term lease and therefore reduces the capacity and timescales for delivery.
- 1.95 The land to the west of Kenn Road (SHLAA ref: HE2036) is located to the west of The Courtyard industrial estate and is allocated for employment development. There have been a number of planning applications historically including an outline planning application for up to 125 dwellings (reference: 16/P/1901/O) which was refused on 27th July 2018 due to the site being allocated for employment, unsustainable development in the countryside and within the floodplain. The site is not allocated within the emerging Local Plan and remains outside of the settlement boundary. There is a Grade II listed located adjacent to the western boundary. The south eastern boundary is adjacent to the M5.
- 1.96 The entirety of the sites are located in Flood Zone 3 (benefitting from flood defences) and have areas at low risk from surface water flooding according to the EA's Flood Risk Maps. Part of the Kenn Road site is located as a wildlife site (Policy DM8 of the SAP Part 1). The Kenn Church, Kenn Pier and Yew Tree Farm SSSI is located to the east of the site, the

Severn Estuary SAC, SSSI and SPA is located to the west of the site, and the site is located within the SSSIs Impact Risk Zone.

- 1.97 This demonstrates that these sites are less desirable for residential development than our proposed development and there is not a reasonable prospect of this site coming forward in the timescales envisaged for our proposed development.

Congresbury

Land east of Brinsea Road, Congresbury

- 1.98 These sites to the east of Brinsea Road have an estimated capacity of 440 dwellings over a site area of 12.57ha.
- 1.99 A planning application for 24 dwellings on the northern most site which is adjacent to the edge of the settlement was refused by North Somerset Council in February 2017 (ref: 16/P/1707/O). Reasons for refusal were in relation to the location of the site outside of the settlement boundary of Congresbury and the impact on the rural landscape character. The applicant appealed the decision and the appeal was dismissed in December 2017 (ref: APP/D0121/W/17/3176151). Despite an acknowledged shortfall in housing land supply, the Inspector concluded that the appeal site would not constitute an appropriate location for development given its remoteness from local services and facilities and would cause harm to the character and appearance of the area and that the '*substantial environmental harm*' would not be outweighed by the benefits of the proposal'.
- 1.100 In light of the above and as the development plan is unchanged since the appeal was dismissed, this land and the wider site are not considered to be a suitable location for development and would not be sequentially preferable to the application site. Even if the land associated with the appeal was omitted, the remaining site would not be connected to the settlement boundary, which has a further negative impact on the development potential and would be located even further from the limited local services and facilities, as outlined in the appeal decision.

Land to east of Wrington Road and Cobthorn Farm, Congresbury

- 1.101 These sites lie to the east of Congresbury and have a combined estimated capacity of 347 dwellings and site area of 18.29ha. The northern part of the site off Wrington Road is allocated in the SAP for 50 dwellings and benefits from planning permission for 50 dwellings (refs: 16/P/1521/OUT and 19/P/1657/RM). It is understood that the site is currently under construction and the allocation is carried through in the emerging local plan.

1.102 The western part of the site at Cobthorn Way is allocated in the SAP for 38 dwellings and planning permission was granted for this amount in January 2018 (refs: 15/P/0519/O and 18/P/3708/RM). The wider site at Cobthorn Farm included in the January 2022 SHLAA has a capacity of 297 units which would be reduced to 259 with the consented scheme. However, significant parts of the residual site lie within Flood Zones 3a and 3b. The site is being built out and the combination of this and flood risk issues on the remainder of the site make it unsuitable to accommodate the proposed development.

Land to the south of Wood Hill, Congresbury

1.103 These sites lie to the north of Congresbury and are bounded by Wood Hill to the north. They have an estimated total capacity of 284 dwellings and a combined site area of 9.28 hectares. The total site grouping is therefore smaller than the lower parameter of site area set out in the methodology.

1.104 The eastern-most parcel of land, Woodhill Nurseries, is a draft allocation in the emerging plan for 60 dwellings. The parcel of land to the north west is subject to a full planning application for 47 dwellings (22/P/1142/FUL) which was submitted in May 2022. The Transport Assessment submitted with the planning application explains that Wood Hill is a single carriageway of varying widths and generally no footway and that it is only wide enough for one-way, but with a number of passing places available. As such, access is proposed from B3133 Smallway to the west and pedestrian access from Wood Hill to the north.

1.105 As such, development at the and access to the remaining land, which does not abut any other public highway, would likely rely on the development of the land adjacent to the B3133. Due to its size and access constraints, this site would not be available for the proposal at the time envisaged.

West of Smallway, Congresbury

1.106 Land to the west of Smallway is located to the west of Congresbury within the strategic gap identified between Yatton and Congresbury in both the SAP and emerging plan. The site is 6.74 hectares in size with an estimated capacity of 202 dwellings.

1.107 Given its location within the strategic gap, the site is not adjacent to the existing settlement of Congresbury and development at this site would be detached from existing residential built form and therefore contrary to policy. It would be opposite a series of commercial premises; however these are distinctly different in character to the main settlement. Development would not be in accordance with existing or emerging planning policies and the site area would not be large enough to accommodate the proposal, being below the

lowest parameter set in the methodology. The site is therefore not reasonably available for the proposal.

Park Farm, Pineapple Farm, east of Congresbury

- 1.108 The sites to the east of Congresbury at Park Farm and Pineapple Farm cover a total area of 9 hectares and have an estimated capacity of 249 dwellings. The southern parcel, Pineapple Farm, is a draft allocation in the emerging local plan for 90 dwellings and an outline planning application was submitted in February 2022 (22/P/0459/OUT) for this number of homes.
- 1.109 There are a group of listed buildings between the two parcels of land and part of the eastern edges of the sites also lie within Flood Zone 3b and there are no flood defences in place here.
- 1.110 The site is not sequentially preferable to the application site given parts lie within Flood Zone 3b. If development was concentrated away from this area, it could reduce the overall capacity of the site. Similarly, the requirement to design a scheme that would not harm the character or setting of the listed buildings would further reduce the developable area. The site is already below the minimum size parameter for the proposal, therefore the restriction of land within the site would make the site even less suitable. As such, the site is not suitable for the proposal.

Land to the west of Brinsea Road, Congresbury

- 1.111 These sites to the west of Brinsea Road cover a total site area of 21.06 hectares and have an estimated capacity of 443 homes. The north eastern parcel immediately west of Brinsea Road was subject to an outline planning application (reference: 14/P/1901/O) for 80 dwellings which was refused in February 2015 and dismissed at appeal (APP/D0121/W/15/3004788). The upheld reasons for refusal were on the grounds of impact on character and appearance and not being an appropriate location for development.
- 1.112 Given these reasons and as the remainder of the site is located further from the settlement and further into the countryside, it is considered that the whole site would therefore be unsuitable for development at the time envisaged.

Land at Drove Road/Rookery Farm

- 1.113 These sites lie to the west of Congresbury and occupy an area of 7.11 hectares and have an estimated capacity of 118 dwellings. Even combined they are therefore below the parameters required for the proposed development. In addition, there are playing fields on parts of the land at the north of the site which are allocated in the Congresbury

Neighbourhood Plan as Local Green Space. As such, development of this land for residential purposes is likely to require mitigation, compensation or the provision of a replacement facility to account for such a loss. Finding a suitable replacement would be a time constraint to the delivery of the development and if this cannot be found and the land cannot be developed, it would reduce the capacity of the site future.

- 1.114 As such, this site is not available for the intended proposal at the envisaged for the development and is not sequentially preferable to the application site.

Edge of Bristol / Barrow Gurney

Barrow Hospital / Barrow Wood Site

- 1.115 The site at Barrow Wood included within the January 2022 SHLAA covers a 75 hectare area to the south of the A370. Part of this land at Barrow Hospital is allocated in the SAP for 20 dwellings. The policy advises that the site was previously allocated for 215 units as part of a mixed use residential and care scheme and that only consented open market dwellings are retained within this allocation.
- 1.116 Part of the land covered by the existing allocation are carried forward into the emerging local plan and are split into two: Barrow Hospital (1) to the north has a draft allocation for 66 dwellings and Barrow Hospital (2) to the south for 14. Both of these sites benefit from full planning permission for these amounts granted in January 2028 (references: 15/P/2301/F and 15/P/2302/F respectively). Completions had not been achieved in April 2021 according to the housing land supply trajectory and it is not clear if development has since commenced.
- 1.117 Regardless of the above, the site lies wholly within the Bristol and Bath green belt and is not proposed for release. The existing and draft allocations would have a maximum capacity of 80 dwellings which is below the lowest threshold for the proposal. The development of additional land outside of the allocation within the greenbelt is unlikely to be forthcoming in the timeframes required for this proposal. As such, this site would not be available for the proposal at the envisaged time of development.

Nailsea

Youngwood Lane and Nailsea

- 1.118 These sites at the south of Nailsea are bordered by Netherton Wood Lane to the east and Youngwood Lane to the south. There are two existing allocations in the SAP: one to the south of The Uplands for 50 homes and the second at Youngwood Lane for 170 homes.

- 1.119 The land to the south of the Uplands is carried through as a draft allocation in the emerging plan for 52 units which includes entry 73 (SHLAA ref: HE20703). Planning permission was granted in October 2021 (20/P/2000/R3) 52 dwellings.
- 1.120 Immediately adjacent to this is land at St Mary's Grove which was submitted to the call for sites for 6 dwellings (SHLAA ref: HE2065). This land is 'locked in' by developments to the east and south and therefore could not accommodate the proposal.
- 1.121 The existing allocation at Youngwood Lane is extended to the south and carried forward to the emerging plan for a total of 450 homes. There is a planning permission on this land for 450 dwellings and associated works (16/P/1677/OT2) granted by a non-determination appeal in November 2019 (APP/D0121/W/18/3212682).
- 1.122 The first phase of this development at the north of the site was granted reserved matters approval in March 2021 (20/P/2347/RM) for 168 homes and development is being advanced by Taylor Wimpey. A second reserved matters application (22/P/1558/RM) for 217 dwellings was submitted in July 2022 by Taylor Wimpey and is awaiting determination. This phase covers central areas of the site and the site plan indicates that a future reserved matters area would be located to the west of the site. The remaining capacity if all 217 dwellings are granted would be 65 dwellings.
- 1.123 Phase 2 would be accessed through phase 1 in the north and then a new subsidiary access would be created at the junction of Netherton Wood Lane and Youngwood Lane to the south west in the future. The delivery of housing in this phase therefore relies on the completion of phase 1 to allow access to residential areas. As both sites are due to be delivered by Taylor Wimpey, they are not available to the Applicant Persimmon Homes Severn Valley to purchase and develop at the timescales intended.
- 1.124 To the east, the draft allocation at Land South of Nailsea for 600 homes incorporates entries 65, 68 and 75 which form part of the 2022 SHLAA. This site is above the higher threshold for the proposal and therefore the part development of the site for the proposal should be considered in line with the PPG. This draft allocation is on the edge of Nailsea, with only a small parcel connected to the existing settlement and none of the land adjacent to the settlement abuts the public highway. The only access apparent at present would be via an agricultural access to the south of Sedgemoor Close which would not be capable of accommodating the proposal. At such, this draft allocation would likely have to come forward as part of the wider proposals for the development of south Nailsea and therefore would not be available for the proposal at the time envisaged for the development.
- 1.125 To the east of this site and Youngwood Lane is a small site with approval for 14 dwellings (entry 290) under application reference 20/P/0861/FUL. This site is too small to

accommodate the proposal and whilst geographically close to the draft allocation at South of Nailsea, would not mitigate any of the issues at that site.

West End, Engine Lane and Netherton Wood Lane

- 1.126 Land to the west of Engine Lane is allocated in the SAP for 183 dwellings and a draft allocation carried through in the emerging local plan for 171 dwellings, which is the amount granted permission in March 2021 through application 17/P/1250/F. The site covers an area of 8.4 hectares and is included in the April 2021 housing land supply trajectory (4/639). Applications to discharge planning conditions are being advanced and development has commenced. This site is below the lowest parameter of 10.2 hectares and with development now commenced, the residual capacity will only reduce further. As such, on the basis of its size and an extant development being progressed, the site is not available for the proposal.
- 1.127 The land at West End and west of Netherton Wood Lane was submitted to the call for sites for an estimated combined 1,367 homes across 68.35 hectares of land. This site lies to the west of the above-mentioned development. The size of these sites far exceeds the upper parameter required for the proposed development, therefore regard has been given to accommodating the proposal on part of this site, in line with the PPG. At present and without the development at Engine Lane having been completed, the site is disconnected from the existing settlement of Nailsea. The development of any part of this site would rely on the completion of the Engine Lane proposal, to ensure the proposal would be connected to the settlement and not in isolation. As such, access would likely be required through this site. The only point at which the eastern part of this site connects to the highway is close to Engine Lane and Netherton Wood Lane, whereby there are existing uses in situ.
- 1.128 Therefore, the development of this site would not be available for the intended proposal at the time envisaged for the development as it would rely on the completion of an adjacent site to ensure connectivity to the settlement and for access.

North West Nailsea

- 1.129 This site is allocated in the SAP for 450 dwellings and this is carried forward as a draft allocation in the emerging Plan. The land at the Stables (SHLAA: HE2066) was submitted separately to the call for sites process and has an estimated capacity of 77 homes. Whilst this is adjacent to the site at North West Nailsea, this parcel is located within the green belt and is therefore not available for the proposal at the intended time.

- 1.130 The site area of Rectory Farm is 13.79ha and as outlined in the Methodology Section, the parameters of the assessment within this sequential test is 10.3ha and 17.2ha. Similarly, 190 dwellings are proposed, with a buffer capacity of between 142 and 237 dwellings.
- 1.131 The site at North West Nailsea is 17.96 hectares in size and has a capacity of 450 dwellings which is therefore beyond the upper limits of the parameters and should be discounted for reasons of being too large. It is also understood that the site is being advanced by another developer and therefore is not available to the Applicant at the required timeframes.

Portishead

Old Mill Road

- 1.132 The site at Old Mill Road in Portishead is allocated in the SAP and is a draft allocation in the Preferred Options Plan, both for a mixed use redevelopment scheme. The SAP sets out that development of the site requires the relocation of existing businesses, or for them to be incorporated into the redevelopment scheme and that no net loss of employment capacity will be supported. The emerging draft allocation is for 350 homes as part of a mixed use redevelopment and explains that the detailed mix of uses is to be determined following the Wyndham Way placemaking study being prepared in consultation with residents and businesses.
- 1.133 A planning application was submitted in 2018 for the redevelopment of the site (ref: 18/P/3591/OUT) however this was withdrawn by the applicant in October 2020 and no documentation is available online. The site is located within Flood Zone 3a, benefiting from flood defences, and there are protected trees located in the centre of the site, both of which would need to be considered as part of any redevelopment. There are several businesses at the site which continue to operate at the time of writing.
- 1.134 Whilst the emerging policy carries limited weight and omits reference to there being no net loss of employment capacity, it does set out that the placemaking study will inform uses. This therefore shows that despite the local plan timescales, the site would not be deliverable at the time intended for the proposal due to the need to await the outcomes of this study. Development would also not be possible at the intended time as the site is currently occupied by businesses, which would need to be relocated in accordance with the SAP. This site is therefore not available for the proposal at the time intended for the development.

Yatton

Land at North End, Chestnut Farm, Moor Road and Yatton Rugby Club

- 1.135 The sites at Yatton Rugby Ground, North End Farm, Moor Road and Chestnut Farm are all adjacent and lie to the north of Yatton.
- 1.136 The Preferred Options Plan identifies the land at Yatton Rugby Club and Moor Road as a draft allocation for 160 dwellings. The Land at Moor Road is allocated in the SAP for 60 homes and a full planning application for 60 dwellings (19/P/3197/FUL) that was refused in July 2021 was allowed at appeal (APP/D0121/W/21/3285343) in April 2022 on this site. The applicant was Persimmon Homes Severn Valley.
- 1.137 Yatton Rugby Club (SHLAA ref: HE2012) has an estimated capacity of 85 dwellings in the January 2022 SHLAA and currently accommodates rugby pitches, netball courts and associated facilities. A full planning application for 87 dwellings (22/P/0455/FUL) was submitted in February 2022 and remains undetermined at the time of writing. The Planning Statement notes that the Rugby Club needs to relocate from the site. Paragraph 99 of the NPPF states that such loss would need to be replaced by equivalent or better provision, which is echoed by Policy CS27 of the Core Strategy. Therefore, land would need to be secured for the existing facilities that would be lost by development at the site. An associated application for development at Kenn Road, Yatton, was submitted at the same time at the residential application (22/P/0456/FUL) which also remains undetermined.
- 1.138 Despite there being an estimated total capacity of 160 dwellings at the site, part of the site already has a planning permission that is being advanced by Persimmon Homes Severn Valley and the remainder of the land is not available at the time envisaged for the development due to the need to relocate sports facilities.
- 1.139 The land at North End is allocated in the SAP for 170 homes and the allocation is proposed to be carried forward and is a draft allocation in the Preferred Options Plan for 154 homes. Outline planning permission was granted in January 2018 (15/P/0946/O) for 170 homes with reserved matters secured in July 2020 (19/P/1884/RM) for 154 homes. This development has commenced and there are many completions on site making the land unavailable for the proposed development by means of its outstanding capacity.
- 1.140 Land at North End Farm and Chestnut Farm (SHLAA ref: HE20425 and HE20630) have an estimated capacity of 31 dwellings and are located adjacent to the development at North End which has already been constructed. Information submitted through the Call for Sites process also confirmed that delivery was estimated to be between 6 and 10 years. As such, it would not be possible for the proposal to be accommodated on these small parcels of land which are detached from other available sites within the timeframe required for this proposal.

1.141 Whilst these sites have an estimated cumulative capacity of approximately 361 dwellings, there have been completions at North End, which lies in the centre of the site and therefore disconnects land to the north and south; the relocation of sports facilities would be required; and part of the site is being brought forward separately by Persimmon Homes Severn Valley. They are therefore not available for the proposed development at the intended time.

Land at Rectory Farm and off Biddle Street

1.142 These sites encompass most of the application site and land to the south which was subject to a refused planning application (21/P/0236/OUT) in May 2021 and allowed appeal (APP/D0121/W/21/3286677) in June 2022 by Mead Realisations. The land not covered by this proposal by Persimmon Homes Severn Valley and within the remit of the allowed appeal site has a capacity of 100 homes, as per the permission. In addition to this not being a suitable capacity to accommodate the proposed development, the land has been acquired by another housebuilder who are bringing forward a reserved matters application for the site. Regardless of the capacity constraints, the site is also not available to the applicant for development.

Land between Yatton and the M5

1.143 Land to the west of Yatton and adjacent to the M5 has an estimated capacity in the SHLAA of 4,325 homes and a site area of 217 hectares. Like the application site, this land lies within Flood Zone 3a and benefits from flood defences, however it also contains land within Flood Zone 3b along Little River. The site borders the M5 to the west, Lampley Road to the north, agricultural accesses to the east and the railway line to the south. Whilst it is adjacent to the settlement of Yatton, the logical access arrangements, through the development at the Arnolds Way allocation sites, does not lie within the site boundary and therefore could present legal issues in terms of securing access. It is also understood that a housebuilder holds a ransom over part of the site. Further, due to its size, the site would have to come forward in a strategic and phased manner as part of a long term strategic development and including a comprehensive masterplanning process.

1.144 As such, this site would not be available for the proposal at the time envisaged for the development and would not be sequentially preferable to the application site in terms of flood risk.

APPENDIX 5
PERSIMMON HOMES WINTERSTOKE VILLAGE PHASING PLAN

PHASE II, HAYWOOD VILLAGE, WESTON PARK, WESTON-SUPER-MARE.

SUB AREAS & PARCELS KEY PLAN.

Order of Sub Area 1 Reserved Matter Applications:
 H19 First Reserved Matter Application
 H14 & H15 Second Reserved Matter Application - to include Airfield Park & Rhyne Park POS
 H21 & H22 Third Reserved Matter Application - to include Allotments & Northern Green POS



SUB AREAS & PARCELS KEY

- Sub Area 1 (Orange square)
- Sub Area 2 (Yellow square)
- Sub Area 3 (Blue square)
- Parcel Boundary (Red line)

ISSUE	DATE	REVISION	BY
A	08.01.18	RM added for Sub Area 1.	RM

Drawing Revisions

PERSIMMON HOMES

	Dwn: RM
	08.10.2017
001	nts @ A3
Sub Areas & Parcels Key Plan	
Phase II Weston Airfield	330 Rev: A